Cody, Karen

From: Nagrani, Kavita
Sent: Thursday, August 29, 2013 5:16 PM
To: Andrews, Blake
Cc: Johnson, Alenda E.
Subject: ABC Coke - Draft of Proposed AOC
Attachments: ABC Coke Draft of Proposed AOC, Sent to Company on August 29, 2013.docx

Hi Blake,

Attached is a draft order that the EPA is sending to you for your review. Specifically, the injunctive relief requested by the EPA is specified in paragraph 16 of this order. Please review, and let me know if the company would be amenable to signing such an order. If so, we will obtain management approval to send you a final draft for signature. If, instead, you have comments or seek to revise any particular provisions of the order, please send me your comments by next Friday, and we will consider them and may make changes, as appropriate. Thanks.

Kavita

Kavita K. Batra, Associate Regional Counsel
U.S. Environmental Protection Agency, Region 4
Office of Environmental Accountability
61 Forsyth Street, S.W.
Atlanta, Georgia 30303
Ph: (404) 562-9697
Fax: (404) 562-9486

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4

IN THE MATTER OF:	) **ADMINISTRATIVE**) **ORDER ON CONSENT**)
ABC COKE DIVISION **THE DRUMMOND COMPANY** **BIRMINGHAM, ALABAMA**	))) **DOCKET NO. CWA-04-2013-4762**
PROCEEDING UNDER SECTION **309(a) OF THE CLEAN WATER ACT,** **33 U.S.C. § 1319(a)** **NPDES PERMIT NO. AL0003417**	))))

ADMINISTRATIVE ORDER ON CONSENT

I. STATUTORY AUTHORITY

1. Section 309(a) of the Clean Water Act ("CWA"), 33 U.S.C. § 1319(a), provides that, whenever the U.S. Environmental Protection Agency, Region 4 ("EPA") finds that any person is in violation of any condition or limitation which implements, *inter alia*, Sections 301 and 402 of the CWA, 33 U.S.C. §§ 1311 and 1342, the EPA may issue an order requiring such person to comply with such condition or limitation, and shall specify a time for compliance that the EPA determines to be reasonable.

2. The following Findings are made and this Administrative Order on Consent is issued pursuant to the authority vested in the Administrator of the EPA, by Section 309(a)(3) of the CWA, 33 U.S.C. § 1319(a)(3), as amended. This authority has been delegated to the Regional Administrator of the EPA, Region 4, and further delegated by the Regional Administrator to the Director of the Region 4 Water Protection Division.

II. EPA FINDINGS

3. To accomplish the objective of the CWA, defined in Section 101(a) of the CWA, 33 U.S.C. § 1251(a), to restore and maintain the chemical, physical, and biological integrity of the nation's waters, Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of pollutants by any person into waters of the United States except as in compliance with a National Pollutant Discharge Elimination System ("NPDES") permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342.

4. Section 402 of the CWA, 33 U.S.C. § 1342, establishes an NPDES Permit Program authorizing the EPA or authorized states to administer the NPDES Permit Program, including the issuance of NPDES permits allowing for the discharge of pollutants into navigable waters subject to specific terms and conditions. The EPA has granted the State of Alabama through the Alabama

Department of Environmental Management ("ADEM") approval to issue NPDES permits pursuant to Section 402(b) of the CWA.

5. ABC Coke Division is a part of Drummond Company, Inc. ("Respondent"), which is a corporation duly organized and existing under the laws of the State of Alabama and is a "person" within the meaning of Section 502(5) of the CWA, 33 U.S.C. § 1362(5).

6. At all times relevant to this action, the Respondent owned and/or operated a Biological Treatment Facility ("BTF"), located in Jefferson County at Railroad Street in Birmingham, Alabama.

7. Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of pollutants into the navigable waters of the United States, except in compliance with certain sections of the CWA.

8. The wastewater treatment plant is operating under NPDES Permit No. AL0003417 ("Permit") that went into effect on April 1, 2009, and the Permit will expire on March 31, 2014.

9. The Permit authorizes discharge of treated process wastewater and stormwater from coke making operations through outfall DSN 001 and discharge of stormwater runoff from the coal yard through outfall DSN 002.

10. On August 13-16, 2012, the EPA conducted a Compliance Evaluation Inspection ("CEI") of the BTF and the industrial site to evaluate the Respondent's compliance with the Permit and the CWA. The CEI identified deficiencies related to preservation methods used to analyze samples, Best Management Practice deficiencies related to the stormwater controls and four unauthorized non-stormwater discharges draining to the stormwater retention pond, which captures the stormwater runoff ultimately discharging through outfall DSN002.

11. On May 10, 2013, the EPA sent a Letter of Concern ("LOC"), issued under the authority of Section 308(a) of the CWA, 33 U.S.C. § 1318(a), to the Respondent regarding the deficiencies identified during the inspection. The LOC also addressed two ammonia nitrogen effluent limits exceedances for the period covering January 1, 2010, through December 31, 2012. The LOC requested information on corrective actions planned or taken to address the deficiencies and effluent limit exceedances.

12. On June 17, 2013, the Respondent provided a response to the LOC. The response addressed all of the deficiencies with the exception that it stated that the NPDES application allowed for these types of non-strormwater to be discharges.

13. On July 16, 2013, the EPA concluded its review of the LOC response and the Respondent's permit application and determined that Part V. of form 2F, which is entitled *Application for Permit to Discharge Storm Water Discharges Associated with Industrial Activity*, contains a certification that all non-stormwater discharges should be identified in either form 2C for discharge of wastewater or 2E for discharge of noncontact process water, and no such non-stormwater discharges are so identified on either of those forms.

14. Based on the above, the Respondent has violated Section 301(a) of the CWA, 33 U.S.C. § 1311(a), in that the Respondent has discharged process wastewater containing pollutants to a location not authorized by an NPDES permit.

15. The EPA has determined that the Respondent has violated Section 301(a) of the CWA, 33 U.S.C. § 1311(a), and the Permit, by failing to comply with Part I.A. and Part II.E.2.a of the Permit.

III. ORDER ON CONSENT

16. Based on the foregoing EPA FINDINGS and pursuant to the authority of Section 309(a) of the CWA, 33 U.S.C. § 1319(a), IT IS HEREBY ORDERED AND RESPONDENT HEREBY AGREES AND CONSENTS TO THE PROVISIONS OF THE PARAGRAPHS BELOW:

A. Within thirty (30) days of the effective date of this Order on Consent, the Respondent shall cease discharge of process wastewater through outfall DSN 002 or submit a modified permit application 2C for discharge of process wastewater and stormwater through outfall DSN002.

B. Within thirty (30) days of the effective date of this Order on Consent, the Respondent shall submit a copy of the revised BMP Plan to EPA and ADEM.

C. Within thirty (30) days of the effective date of this Order on Consent, the Respondent shall provide a description of the method utilized for routine cleaning and a schedule for which the cleaning of the stormwater catch basin will take place.

D. Within sixty (60) days of the effective date of this Order on Consent, the Respondent shall submit an engineering report assessing all stormwater runoff and process wastewater sources that contributed to the stormwater collection system (catch basin & retention pond). This assessment shall include an engineer calculation of the design storm, total hydraulic capacity as well as the inorganic/organic loading capacity of the stormwater treatment system. The engineer report shall be certified by Professional Engineer and submitted to EPA and ADEM.

E. Every month after the effective date of this Order on Consent, and continuing until all corrective actions have been completed, the Respondent shall submit to the EPA a written report containing information about the status and progress of the permit application for all notice and communication provided to and from ADEM. The report shall also include a description of actions implemented to prevent future recurrence. The Respondent shall submit the report to the EPA within fifteen (15) days of the end of each month. The first monthly report shall be due following the end of the month during which this Order on Consent becomes effective.

17. All reports, notifications, documentation, and submittals required by this Order on Consent shall be signed by a duly authorized representative of ABC Coke Division as specified by 40 C.F.R. §§ 122.22(b)(2) and (d) and shall include the following statement:

> "I certify under the penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

18. All reports, notifications, documentation and submittals required by this Order on Consent shall be sent by certified mail or its equivalent to the following addresses:

Denisse D. Diaz, Chief
Clean Water Enforcement Branch
Water Protection Division
ATTN: Alenda Johnson
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

Glenda L. Dean, Chief
Water Division
Alabama Department of Environmental Management
P.O. Box 301463
Birmingham, Alabma 36130 -1463

IV. GENERAL PROVISIONS

19. The Respondent's compliance with this Order on Consent does not necessarily constitute compliance with the provisions of the CWA, 33 U.S.C. § 1251 et seq., or with Respondent's NPDES permit. The Respondent shall remain solely responsible for compliance with the terms of the CWA and this Order on Consent and its NPDES permit.

20. Failure to comply with the requirements herein shall constitute a violation of this Order on Consent and the CWA, and may subject Respondent to penalties as provided in Section 309(d) of the CWA, 33 U.S.C. § 1319(d).

21. This Order on Consent shall not relieve the Respondent of its obligation to comply with all applicable provisions of federal, state or local law, nor shall it be construed to be a ruling on, or determination of, any issue related to any other federal, state or local permit. Compliance with this Order on Consent shall not be a defense to any actions subsequently commenced pursuant to federal laws and regulations administered by EPA.

22. Issuance of this Order on Consent shall not be deemed an election by EPA to forego any remedies available to it under law, including without limitation, any administrative, civil, or criminal action to seek penalties, fines, or other appropriate relief (including injunctive relief) under the CWA or any other federal or state statute, regulation or permit. EPA reserves all rights and remedies, legal and equitable, available to enforce any violation cited in this Order on Consent and to enforce this Order on Consent.

23. This AOC is entered into voluntarily by Respondent to address and remedy the violations asserted herein by the EPA. This AOC has been negotiated by the parties in good faith.

24. This Order on Consent applies to and is binding upon Respondent and its officers, directors, employees, agents, successors and assigns.

25. Any change in the legal status of Respondent, including but not limited to any transfer of assets of real or personal property, shall not alter Respondent's responsibilities under this Order on Consent.

26. For purposes of this Order on Consent, Respondent admits to the jurisdictional allegations set forth herein.

27. The Respondent waives any and all claims for relief and otherwise available rights or remedies to judicial or administrative review which Respondent may have with respect to any issue of fact or law set forth in this Order on Consent, including, but not limited to, any right of judicial review of this Order on Consent under the Administrative Procedure Act, 5 U.S.C. §§ 701-706.

28. Pursuant to Section 309(a)(4) of the CWA, 33 U.S.C. § 1319(a)(4), EPA has sent a copy of this Order on Consent to the State of Alabama.

29. The provisions of this AOC shall be deemed satisfied upon a determination by the EPA that Respondent has fully completed and implemented the actions required by this AOC.

V. EFFECTIVE DATE

30. This Order on Consent shall become effective upon Respondent's receipt of the fully executed Order on Consent.

FOR THE RESPONDENT:

_____ Date:_____
ABC Coke Division of Drummond Company, Inc.
Print Title_____

FOR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

_____ Date:_____
James D. Giattina
Director
Water Protection Division

Cody, Karen

From: Nagrani, Kavita
Sent: Tuesday, September 24, 2013 12:43 PM
To: Andrews, Blake; Poling, W. Mark
Cc: Horsey, Maurice; Johnson, Alenda E.
Subject: ABC Coke AOC - Final For Signature
Attachments: ABC AOC - Final Sent for Signature, September 24, 2013.pdf

Hi Blake/Mark,

I'm sending you both a PDF copy of the final, agreed upon settlement agreement, ready for signature by ABC/Drummond. As I mentioned in my earlier email, we need to finalize the AOC by the end of this week, so please return to me (at my address below) the original, signed signature page of this AOC, today or tomorrow so that I may receive the signature page before this upcoming Friday. I will be in the office every day this week, so please feel free to give me a call if you have any questions or concerns. Thanks!

Kavita

Kavita K. Batra, Associate Regional Counsel
U.S. Environmental Protection Agency, Region 4
Office of Environmental Accountability
61 Forsyth Street, S.W.
Atlanta, Georgia 30303
Ph: (404) 562-9697
Fax: (404) 562-9486

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4

IN THE MATTER OF:	) **ADMINISTRATIVE**) **ORDER ON CONSENT**
	)
ABC COKE DIVISION **THE DRUMMOND COMPANY** **BIRMINGHAM, ALABAMA**	)) **DOCKET NO. CWA-04-2013-4762**
	)
PROCEEDING UNDER SECTION **309(a) OF THE CLEAN WATER ACT,** **33 U.S.C. § 1319(a)** **NPDES PERMIT NO. AL0003417**	)

ADMINISTRATIVE ORDER ON CONSENT

I. STATUTORY AUTHORITY

1. Section 309(a) of the Clean Water Act ("CWA"), 33 U.S.C. § 1319(a), provides that, whenever the U.S. Environmental Protection Agency, Region 4 ("EPA") finds that any person is in violation of any condition or limitation which implements, *inter alia*, Sections 301 and 402 of the CWA, 33 U.S.C. §§ 1311 and 1342, the EPA may issue an order requiring such person to comply with such condition or limitation, and shall specify a time for compliance that the EPA determines to be reasonable.

2. The following Findings are made and this Administrative Order on Consent is issued pursuant to the authority vested in the Administrator of the EPA, by Section 309(a)(3) of the CWA, 33 U.S.C. § 1319(a)(3), as amended. This authority has been delegated to the Regional Administrator of the EPA, Region 4, and further delegated by the Regional Administrator to the Director of the Region 4 Water Protection Division.

II. EPA FINDINGS

3. To accomplish the objective of the CWA, defined in Section 101(a) of the CWA, 33 U.S.C. § 1251(a), to restore and maintain the chemical, physical, and biological integrity of the nation's waters, Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of pollutants by any person into waters of the United States except as in compliance with a National Pollutant Discharge Elimination System ("NPDES") permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342.

4. Section 402 of the CWA, 33 U.S.C. § 1342, establishes an NPDES Permit Program authorizing the EPA or authorized states to administer the NPDES Permit Program, including the issuance of NPDES permits allowing for the discharge of pollutants into navigable waters subject to specific terms and conditions. The EPA has granted the State of Alabama through the Alabama

Department of Environmental Management ("ADEM") approval to issue NPDES permits pursuant to Section 402(b) of the CWA.

5. ABC Coke Division is a part of Drummond Company, Inc. ("Respondent"), which is a corporation duly organized and existing under the laws of the State of Alabama and is a "person" within the meaning of Section 502(5) of the CWA, 33 U.S.C. § 1362(5).

6. At all times relevant to this action, the Respondent owned and/or operated a Biological Treatment Facility ("BTF"), located in Jefferson County at Railroad Street in Birmingham, Alabama.

7. Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of pollutants into the navigable waters of the United States, except in compliance with certain sections of the CWA.

8. The wastewater treatment operations, including the BTF and any other specified measures for control of pollutant and discharges from the ABC manufacturing plant, are regulated under NPDES Permit No. AL0003417 ("Permit") that went into effect on April 1, 2009, and the Permit will expire on March 31, 2014.

9. The Permit authorizes discharge of treated process wastewater and stormwater from coke making operations through outfall DSN 001 and discharge of stormwater runoff from the coal yard through outfall DSN 002. Monitoring requirements in the Permit applicable to DSN 002 require Respondent to monitor constituents that would indicate a discharge of any process related pollutants from the coal yard.

10. On August 13-16, 2012, the EPA conducted a Compliance Evaluation Inspection ("CEI") of the BTF and the industrial site to evaluate the Respondent's compliance with the Permit and the CWA. The CEI identified deficiencies related to preservation methods used to analyze samples, Best Management Practice deficiencies related to the stormwater controls and four non-stormwater discharges draining to the stormwater retention pond, which captures the stormwater runoff ultimately discharging through outfall DSN002. EPA found that one of those discharges was not specifically included in the Permit, and the others were not discharging in accordance with the terms of the Permit.

11. On May 10, 2013, the EPA sent a Letter of Concern ("LOC"), issued under the authority of Section 308(a) of the CWA, 33 U.S.C. § 1318(a), to the Respondent regarding alleged deficiencies identified during the inspection. The LOC also alleged two ammonia nitrogen effluent limits exceedances for the period covering January 1, 2010, through December 31, 2012. The LOC requested information on corrective actions planned or taken to address the deficiencies and effluent limit exceedances.

12. On June 17, 2013, the Respondent provided a response to the LOC. The response addressed all of the deficiencies with the exception that it stated that the Respondent believed the NPDES application allowed for these types of non-stormwater discharges and that three of these discharges were reflected as "miscellaneous" discharges in Respondent's application for the Permit. The fourth discharge reflected a release from a Jefferson County pipeline that has been repaired, such that the release has ceased.

13. On July 16, 2013, the EPA concluded its review of the LOC response and the Respondent's permit application and determined that Part V. of form 2F, which is entitled *Application for Permit to Discharge Storm Water Discharges Associated with Industrial Activity*, contains a certification that all non-stormwater discharges should be identified in either form 2C for discharge of wastewater or 2E for discharge of noncontact process water, and no such non-stormwater discharges are so identified on either of those forms.

14. Based on the above, EPA has determined that the Respondent has violated Section 301(a) of the CWA, 33 U.S.C. § 1311(a), in that the Respondent has discharged wastewater to a location not authorized by an NPDES permit.

15. The EPA has determined that the Respondent has violated Section 301(a) of the CWA, 33 U.S.C. § 1311(a), and the Permit, by failing to comply with Part I.A. and Part II.E.2.a of the Permit.

16. To resolve this dispute, Respondent submitted an application for an amendment to the Permit that would clearly reflect that the continuing discharges to the stormwater control system are authorized.

17. On August 20, 2013, the Alabama Department of Environmental Management sent a Draft Permit modification to the Respondent for review that, if it becomes final, will authorize the three non-stormwater discharges through outfall DSN 002.

18. The Draft Permit will not become final until EPA and the public have commented on the Draft Permit, ADEM considers any comments, and makes a decision to issue a final permit, to deny the permit application or to modify the Draft Permit.

III. ORDER ON CONSENT

19. Based on the foregoing EPA FINDINGS and pursuant to the authority of Section 309(a) of the CWA, 33 U.S.C. § 1319(a), IT IS HEREBY ORDERED AND RESPONDENT HEREBY AGREES AND CONSENTS TO THE PROVISIONS OF THE PARAGRAPHS BELOW:

A. If ADEM does not issue the Draft Permit due to any deficiencies identified by ADEM, either with the permit application itself or otherwise, within thirty (30) days from when Respondent receives notification from ADEM that the application is deficient, Respondent shall submit to ADEM any and all additional information necessary to address the deficiencies identified by ADEM. If ADEM issues a final Permit that does not authorize the discharges of any of the waste streams, as they are currently described in the Draft Permit, or if ADEM does not grant the permit modification, then within thirty (30) days from the date of ADEM's decision, Respondent shall immediately cease any discharges that are not authorized by Respondent's NPDES Permit, as issued by ADEM.

B. Within thirty (30) days of the effective date of this Order on Consent, the Respondent shall submit a copy of the revised BMP Plan to EPA and ADEM.

C. Within thirty (30) days of the effective date of this Order on Consent, the Respondent shall provide a description of the method utilized for routine cleaning and a schedule for which the cleaning of the stormwater catch basin will take place.

D. Within sixty (60) days of the effective date of this Order on Consent, the Respondent shall submit an engineering report assessing all stormwater runoff and process wastewater sources that contributed to the stormwater collection system (catch basin & retention pond). This assessment shall include an engineer calculation of the design storm, total hydraulic capacity as well as the inorganic/organic loading capacity of the stormwater treatment system. The engineer report shall be certified by Professional Engineer and submitted to EPA and ADEM.

E. Every month after the effective date of this Order on Consent, and continuing until all corrective actions have been completed, the Respondent shall submit to the EPA a written report containing information about the status and progress of the permit modification. The report shall also include a description of actions implemented to prevent future recurrence. The Respondent shall submit the report to the EPA within fifteen (15) days of the end of each month. The first monthly report shall be due following the end of the month during which this Order on Consent becomes effective.

20. All reports, notifications, documentation, and submittals required by this Order on Consent shall be signed by a duly authorized representative of ABC Coke Division as specified by 40 C.F.R. §§ 122.22(b)(2) and (d) and shall include the following statement:

> "I certify under the penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

21. All reports, notifications, documentation and submittals required by this Order on Consent shall be sent by certified mail or its equivalent to the following addresses:

Denisse D. Diaz, Chief
Clean Water Enforcement Branch
Water Protection Division
ATTN: Alenda Johnson
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

Glenda L. Dean, Chief
Water Division
Alabama Department of Environmental Management
P.O. Box 301463
Birmingham, Alabma 36130 -1463

IV. GENERAL PROVISIONS

22. The Respondent's compliance with this Order on Consent does not necessarily constitute compliance with the provisions of the CWA, 33 U.S.C. § 1251 et seq., or with Respondent's NPDES permit. The Respondent shall remain solely responsible for compliance with the terms of the CWA and this Order on Consent and its NPDES permit.

23. Failure to comply with the requirements herein shall constitute a violation of this Order on Consent and the CWA, and may subject Respondent to penalties as provided in Section 309(d) of the CWA, 33 U.S.C. § 1319(d).

24. This Order on Consent shall not relieve the Respondent of its obligation to comply with all applicable provisions of federal, state or local law, nor shall it be construed to be a ruling on, or determination of, any issue related to any other federal, state or local permit. Compliance with this Order on Consent shall not be a defense to any actions subsequently commenced pursuant to federal laws and regulations administered by EPA.

25. Issuance of this Order on Consent shall not be deemed an election by EPA to forego any remedies available to it under law, including without limitation, any administrative, civil, or criminal action to seek penalties, fines, or other appropriate relief (including injunctive relief) under the CWA or any other federal or state statute, regulation or permit. EPA reserves all rights and remedies, legal and equitable, available to enforce any violation cited in this Order on Consent and to enforce this Order on Consent.

26. This AOC is entered into voluntarily by Respondent to address and remedy the violations asserted herein by the EPA. This AOC has been negotiated by the parties in good faith.

27. This Order on Consent applies to and is binding upon Respondent and its officers, directors, employees, agents, successors and assigns.

28. Any change in the legal status of Respondent, including but not limited to any transfer of assets of real or personal property, shall not alter Respondent's responsibilities under this Order on Consent.

29. For purposes of this Order on Consent, Respondent admits to the jurisdictional allegations set forth herein but neither admits nor denies the EPA's Findings of Fact, set forth above. The EPA asserts that the facts stated herein are true and substantiated.

30. The Respondent waives any and all claims for relief and otherwise available rights or remedies to judicial or administrative review which Respondent may have with respect to any issue of fact or law set forth in this Order on Consent, including, but not limited to, any right of judicial review of this Order on Consent under the Administrative Procedure Act, 5 U.S.C. §§ 701-706.

31. Pursuant to Section 309(a)(4) of the CWA, 33 U.S.C. § 1319(a)(4), EPA has sent a copy of this Order on Consent to the State of Alabama.

32. The provisions of this AOC shall be deemed satisfied upon a determination by the EPA that Respondent has fully completed and implemented the actions required by this AOC.

V. EFFECTIVE DATE

33. This Order on Consent shall become effective upon Respondent's receipt of the fully executed Order on Consent.

FOR THE RESPONDENT:

_____ Date:_____
ABC Coke Division of Drummond Company, Inc.
Name: _____
Print Title: _____

FOR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

_____ Date:_____
James D. Giattina
Director
Water Protection Division

Cody, Karen

From: Nagrani, Kavita
Sent: Wednesday, August 6, 2014 5:07 PM
To: 'Andrews, Blake'
Cc: Johnson, Alenda E.
Subject: ABC Proposed Penalty Settlement Documents
Attachments: Proposed Penalty Order for ABC Coke - to send to company on 08-06-14 - no metadata.docx; Penalty Policy - 402.pdf

Hi Blake,

Attached is a draft Consent Agreement and Final Order (CAFO), to potentially resolve a civil penalty with ABC Coke. We did decide to wait until after today's call to seek management's approval on this document, so that is currently pending. As a result, there is a possibility our management will request some changes to this document, in which case I will let you know of any additional changes. Otherwise, as I mentioned, this is a pretty boiler-plate document, but please let me know ASAP if you see something that you think we need to change. We did include many of the facts that previously were in the Administrative Order on Consent (AOC), so the beginning of the document will look familiar.

Also, I am attaching a PDF of the 1995 Interim Penalty Policy that was used to calculate the penalty numbers for this case.

Please let me know if you have any other questions or concerns. Thanks!

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4

IN THE MATTER OF:	) **ADMINISTRATIVE**) **ORDER ON CONSENT**
ABC COKE DIVISION **THE DRUMMOND COMPANY** **BIRMINGHAM, ALABAMA**	) **DOCKET NO. CWA-04-2014-4507(b)**
PROCEEDING UNDER SECTION 309(a) OF THE CLEAN WATER ACT, **33 U.S.C. § 1319(a)** **NPDES PERMIT NO. AL0003417**	)

ADMINISTRATIVE ORDER ON CONSENT

I. STATUTORY AUTHORITY

1. This is a civil penalty proceeding pursuant to Section 309(g)(2)(A) of the Clean Water Act ("CWA"), 33 U.S.C. § 1319(g)(2)(A), and the *Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, Issuance of Compliance or Corrective Action Orders and the Revocation, Termination or Suspension of Permits*, including Subpart I, published at 64 Fed. Reg. 40176 (July 23, 1999), and codified at 40 Code of Federal Regulations ("C.F.R.") Part 22.

2. The authority to take action under Section 309(g)(2)(A) of the CWA, 33 U.S.C. § 1319(g)(2)(A), is vested in the Administrator of the United States Environmental Protection Agency ("EPA"). The Administrator has delegated this authority to the Regional Administrator Region 4, who in turn has re-delegated this authority to the Director of the Water Protection Division, who in turn has delegated this authority to the Chief of the Clean Water Enforcement Branch of EPA Region 4 ("Complainant").

II. ALLEGATIONS

3. ABC Coke Division is a part of Drummond Company, Inc. ("Respondent"), which is a corporation duly organized and existing under the laws of the State of Alabama and is a "person" within the meaning of Section 502(5) of the CWA, 33 U.S.C. § 1362(5).

4. At all times relevant to this action, the Respondent owned and/or operated a Biological Treatment Facility ("BTF"), located in Jefferson County at Railroad Street in Birmingham, Alabama.

5. To accomplish the objectives of the CWA, defined in Section 101(a) of the CWA, 33 U.S.C. § 1251(a), to restore and maintain the chemical, physical and biological integrity of the nation's waters, Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of pollutants by any person into waters of the United States except as in compliance with a National Pollutant Discharge Elimination System ("NPDES") permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342.

6. Section 402 of the CWA, 33 U.S.C. § 1342, establishes an NPDES Permit Program authorizing the EPA or authorized states to administer the NPDES Permit Program, including the issuance of NPDES permits allowing for the discharge of pollutants into navigable waters subject to specific terms and conditions. The EPA has granted the State of Alabama through the Department of Environmental Management ("ADEM") approval to issue NPDES permits pursuant to Section 402(b) of the CWA.

7. The BTF is operating under NPDES Permit No. AL0003417 ("Permit"), issued on March 3, 2009, and was administratively continued on March 31, 2014.

8. The Permit authorizes discharge of treated process wastewater and stormwater from coke making operations through outfall DSN 001 and discharge of stormwater runoff from the coal yard through outfall DSN 002. Monitoring requirements in the Permit applicable to DSN 002 require Respondent to monitor constituents that would indicate a discharge of any process related pollutants from the coal yard.

9. On August 13-16, 2012, the EPA conducted a Compliance Evaluation Inspection ("CEI") of the BTF and the industrial site to evaluate the Respondent's compliance with the Permit and the CWA. The CEI identified deficiencies related to preservation methods used to analyze samples, Best Management Practice deficiencies related to the stormwater controls and four non-stormwater discharges draining to the stormwater retention pond, which captures the stormwater runoff ultimately discharging through outfall DSN002. EPA found that one of those discharges was not specifically included in the Permit, and the others were not discharging in accordance with the terms of the Permit.

10. On May 10, 2013, the EPA sent a Letter of Concern ("LOC"), issued under the authority of Section 308(a) of the CWA, 33 U.S.C. § 1318(a), to the Respondent regarding alleged deficiencies identified during the inspection. The LOC also alleged two ammonia nitrogen effluent limit exceedances for the period covering January 1, 2010, through December 31, 2012. The LOC requested information on corrective actions planned or taken to address the deficiencies and effluent limit exceedances.

11. On June 17, 2013, the Respondent provided a response to the LOC. The response addressed all of the deficiencies with the exception that it stated that the Respondent believed the NPDES application allowed for these types of non-stormwater discharges and that three of these discharges were reflected as "miscellaneous" discharges in Respondent's application for the Permit. The fourth discharge reflected a release from a Jefferson County pipeline that has been repaired, such that the release has ceased.

12. On July 16, 2013, the EPA concluded its review of the LOC response and the Respondent's permit application and determined that Part V. of form 2F, which is entitled *Application for Permit to Discharge Storm Water Discharges Associated with Industrial Activity*, contains a certification that all non-stormwater discharges should be identified in either form 2C for discharge of wastewater or 2E for discharge of noncontact process water, and no such non-stormwater discharges are so identified on either of those forms.

13. Based on the above, EPA has determined that the Respondent has violated Section 301(a) of the CWA, 33 U.S.C. § 1311(a), in that the Respondent has discharged wastewater to a location not authorized by an NPDES permit. The EPA has determined that the Respondent has violated Section 301(a) of the CWA, 33 U.S.C. § 1311(a), and the Permit, by failing to comply with Part I.A. and Part II.E.2.a of the Permit.

14. In addition, upon conducting a subsequent record review of Respondent's last three years of compliance history, EPA determined that Respondent violated its whole effluent toxicity ("WET") limit for September 2013. Therefore, the EPA determined that the Respondent has violated Section 301(a) of the CWA, 33 U.S.C. § 1311(a), and the Permit, by failing to comply with Part I.A of the Permit.

III. STIPULATIONS AND FINDINGS

15. Complainant and Respondent have conferred for the purpose of settlement pursuant to 40 C.F.R. § 22.18 and desire to resolve this matter and settle the allegations described herein without a formal hearing. Therefore, without the taking of any evidence or testimony, the making of any argument, or the adjudication of any issue in this matter, and in accordance with 40 C.F.R. § 22.13(b), this Consent Agreement and Final Order ("CA/FO") will simultaneously commence and conclude this matter.

16. For the purposes of this CA/FO, Respondent admits the jurisdictional allegations set out above and neither admits nor denies the factual allegations set out above.

17. Respondent hereby waives its right to contest the allegations set out above and its right to appeal the Final Order accompanying this Consent Agreement.

18. Respondent consents to the assessment of and agrees to pay the civil penalty as set forth in this CA/FO.

19. By signing this CA/FO, Respondent certifies that the information it has supplied concerning this matter was at the time of submission, and is, truthful, accurate, and complete for each such submission, response and statement. Respondent realizes that there are significant penalties for submitting false or misleading information, including the possibility of fines and/or imprisonment for knowing submission of such information.

20. The EPA reserves the right to assess and collect any and all civil penalties for any violation described herein to the extent that any information or certification provided by

Respondent was materially false or inaccurate at the time such information or certification was provided to EPA.

21. Complainant and Respondent agree to settle this matter by their execution of this CA/FO. The parties agree that the settlement of this matter is in the public interest and that this CA/FO is consistent with the applicable requirements of the CWA.

IV. PAYMENT

22. Pursuant to Section 309(g)(2)(A) of the CWA, 33 U.S.C. § 1319(g)(2)(A), and considering the nature of the violations and other relevant factors, the EPA has determined that Twenty Thousand Five Hundred Fifty Dollars ($20,550) is an appropriate civil penalty to settle this action.

23. Respondent shall submit payment of the penalty specified in the preceding paragraph via a cashier's or certified check, payable to the order of "Treasurer, United States of America." The check shall reference on its face the name of Respondent and the Docket Number of this CA/FO. Such payment shall be tendered to:

U.S. Environmental Protection Agency
Fines and Penalties
Cincinnati Finance Center
P.O. Box 979077
St. Louis, Missouri 63197-9000

24. At the time of payment, Respondent shall send a separate copy of the check, and a written statement that payment has been made in accordance with this CA/FO, to the following persons at the following addresses:

Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

and

Ms. Mary Mattox
U.S. Environmental Protection Agency, Region 4
Water Protection Division
Clean Water Enforcement Branch
Municipal and Industrial Enforcement Section
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

25. The penalty amount specified in Paragraph 22 above shall represent civil penalties assessed by the EPA and shall not be deductible for purposes of federal taxes.

26. Pursuant to Section 309(g)(9) of the CWA, 33 U.S.C. § 1319(g)(9), failure by the Respondent to pay the penalty assessed by the CA/FO in full by its due date may subject the Respondent to a civil action to collect the assessed penalty plus interest (at currently prevailing rates from the effective date of this CA/FO), attorney's fees, costs for collection proceedings and a quarterly nonpayment penalty for each quarter during which such failure to pay persists. Such nonpayment penalty shall be in an amount equal to twenty per cent (20%) of the aggregate amount of such penalty and nonpayment penalty which are unpaid as of the beginning of such quarter. In any such collection action, the validity, amount and appropriateness of the penalty and of this CA/FO shall not be subject to review.

V. GENERAL PROVISIONS

27. This CA/FO shall not relieve Respondent of its obligation to comply with all applicable provisions of federal, state, or local law, nor shall it be construed to be a ruling on, or determination of, any issue related to any federal, state, or local permit. Other than as expressed herein, compliance with this CA/FO shall not be a defense to any actions subsequently commenced pursuant to federal laws and regulations administered by the EPA.

28. Nothing in this CA/FO shall be construed as prohibiting, altering, or in any way limiting the ability of the United States to seek any other remedies or sanctions available by virtue of Respondent's violation of this CA/FO or of the statutes and regulations upon which this agreement is based, or for Respondent's violation of any federal or state statute, regulation or permit. The EPA shall not seek further corrective action for the violations alleged in this CA/FO, if the Respondent complies with the payment required under Section IV of this CA/FO.

29. Except as otherwise set forth herein, this CA/FO constitutes a settlement by Complainant and Respondent of all claims for civil penalties pursuant to the CWA with respect to only those violations alleged in this CA/FO. Nothing in this CA/FO is intended to nor shall be construed to operate in any way to resolve any criminal liability of the Respondent, or other liability resulting from violations that were not alleged in this CA/FO. Other than as expressed herein, Complainant does not waive any right to bring an enforcement action against Respondent for violation of any federal or state statute, regulation or permit, to initiate an action for imminent and substantial endangerment, or to pursue criminal enforcement.

30. Each undersigned representative of the parties to this CA/FO certifies that he or she is fully authorized to enter into the terms and conditions of this CA/FO and to execute and legally bind that party to it.

31. This CA/FO applies to and is binding upon Respondent and its officers, directors, employees, agents, successors and assigns.

32. Any change in the legal status of Respondent including, but not limited to, any transfer of assets of real or personal property, shall not alter Respondent's responsibilities under this CA/FO.

33. Each party shall bear its own costs and attorney's fees in connection with the action resolved by this CA/FO.

34. In accordance with 40 C.F.R. § 22.5, the individuals below are authorized to receive service relating to this proceeding.

For Complainant:

Kavita K. Nagrani
Associate Regional Counsel
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960
(404) 562-9697

For Respondent:

Facility Representative
Position
ABC Coke Division
Railroad Street
Birmingham, Alabama 35202

35. The parties acknowledge and agree that this CA/FO is subject to the requirements of 40 C.F.R. § 22.45(c)(4), which provides a right to petition to set aside a Consent Agreement and proposed Final Order based on comments received during the public comment period.

36. Pursuant to Section 309(g) of the CWA, 33 U.S.C. § 1319(g), and 40 C.F.R. §22.38(b), Complainant represents that the State of Alabama was provided a prior opportunity to consult with Complainant regarding this matter.

37. Effective upon signature of this CA/FO by Respondent, Respondent agrees that the time period commencing on the date of its signature and ending on the date the EPA receives from Respondent the payment required by this CA/FO shall not be included in computing the running of any statute of limitations potentially applicable to any action brought by the EPA related to the matters addressed in this CA/FO and that, in any action brought by the EPA related to the matters addressed, Respondent will not assert, and may not maintain, any defense or claim based upon principles of statute of limitations, waiver, laches, estoppel, or other defense based on the passage of time during such period. If EPA gives notice to Respondent that it will not make this CA/FO effective, the statute of limitations shall begin to run again commencing ninety days after the date such notice is sent by the EPA.

VI. EFFECTIVE DATE

38. The effective date of this CA/FO shall be the date on which the CA/FO is filed with the Regional Hearing Clerk.

FOR THE RESPONDENT:

_____ Date:_____
ABC Coke Division of Drummond Company, Inc.
Name: _____
Print Title:_____

FOR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

_____ Date:_____
Denisse D. Diaz, Chief
Clean Water Enforcement Branch
Water Protection Division
U.S. EPA Region 4

INTERIM CLEAN WATER ACT SETTLEMENT PENALTY POLICY

March 1, 1995

TABLE OF CONTENTS

I. INTRODUCTION

Section 309 of the Clean Water Act (CWA), (33 U.S.C. §1319) authorizes the Administrator of the U.S. Environmental Protection Agency ("EPA" or "Agency") to bring civil judicial and administrative actions against those who violate certain enumerated requirements of the CWA. In such actions the Administrator may seek civil penalties.

EPA brings enforcement actions to require alleged violators to promptly correct the violations and remedy any harm caused by the violations. As part of an enforcement action, EPA also seeks substantial monetary penalties which promote environmental compliance and help protect public health by deterring future violations by the same violator and deterring violations by other members of the regulated community. Penalties help ensure a national level playing field by ensuring that violators do not obtain an unfair economic advantage over competitors who have done whatever was necessary to comply on time. Penalties also encourage companies to adopt pollution prevention and recycling techniques, so that they minimize their pollutant discharges and reduce their potential liabilities.

This Policy implements the Agency's February 1984 general *Policy on Civil Penalties* (#GM-21) and the companion document, *A Framework for Statute Specific Approaches to Penalty Assessments* (#GM-22), both issued on February 16, 1984. This Policy revises and hereby supersedes the *Clean Water Act Penalty Policy for Civil Settlement Negotiations* issued on February 11, 1986.[1]

This document sets forth the policy of the EPA for establishing appropriate penalties in settlement of civil judicial and administrative actions. Subject to the circumstances of a particular case, this policy provides the lowest penalty figure which the Federal Government should accept in a settlement. This Policy is drafted so that violators whose actions, or inactions, resulted in a significant economic benefit and/or harmed or threatened public health or the environment will pay the highest penalties. Obviously, where settlement is not possible, the Government reserves the right to seek penalties up to the statutory maximum.

II. PURPOSE

[1] The guidances issued to interpret and supplement the 1986 Penalty Policy are also superseded. These documents are the: Addendum to the Clean Water Act Civil Penalty Policy for Administrative Penalties, issued August 28, 1987; Guidance on Penalty Calculations for POTW Failure to Implement an Approved Pretreatment Program, issued December 22, 1988; Bottomline Penalties for Cases Involving More than Five Years of Non-Compliance, issued May 11, 1992; Gravity Penalty Pilot Policy for Clean Water Act Cases, issued November 12, 1992; and Final Interim Guidance on Use of Litigation Consideration Reductions in the Clean Water Act Penalty Policy, issued October 10, 1993 (which incorporated the November 1992 Gravity Penalty Pilot Policy).

The purpose of this Policy is to further four important environmental goals. First, penalties should be large enough to deter noncompliance. Second, penalties should help ensure a level playing field by ensuring that violators do not obtain an economic advantage over their competitors. These two goals generally require that penalties recover the economic benefit of noncompliance, plus an appropriate gravity amount. Third, CWA penalties should be generally consistent across the country. This is desirable as it not only prevents the creation of "pollution havens" in different parts of the nation, but also provides fair and equitable treatment to the regulated community wherever they may operate. Fourth, settlement penalties should be based on a logical calculation methodology to promote swift resolution of enforcement actions and the underlying violations.

III. APPLICABILITY

This Policy applies to all CWA civil judicial and administrative actions filed after the effective date of this Policy, and to all such pending cases in which the government has not yet transmitted to the defendant or respondent an oral or written proposed settlement penalty amount. This Policy also may be applied (instead of the 1986 version) in pending cases in which penalty negotiations have commenced if application of this Policy would not be disruptive to the negotiations. This Policy applies to civil judicial and administrative penalties sought under CWA §309, including: violations of NPDES permit limits and conditions; discharges without an NPDES permit; violations of pretreatment standards and requirements (including local limits and pretreatment programs); violations of §405 sludge use or disposal requirements; violations of §308 information requests; and violations of §309(a) compliance orders. This Policy does not apply to actions brought exclusively under CWA §311 (oil and hazardous substance spills) nor for violations of requirements in §404 ("wetlands" cases involving disposal of dredged or fill material). Separate penalty policies apply to these two types of cases.

This Policy sets forth how the Agency generally expects to exercise its enforcement discretion in deciding on an appropriate enforcement response and determining an appropriate settlement penalty. In some cases, the calculation methodology set forth here may not be appropriate, in whole or part; in such cases, with the advance approval of the Assistant Administrator, an alternative or modified approach may be used.

This Policy only establishes how the Agency expects to calculate the minimum penalty for which it would be willing to settle a case. The development of the penalty amount to plead in an administrative or judicial complaint is developed independent of this Policy, except that the Agency may not seek a settlement penalty in excess of the statutory maximum penalty for the violations alleged in the complaint. This Policy is not intended for use by EPA, violators, courts, or administrative judges in determining penalties at a hearing or trial. (Also see §VI below).

A settlement penalty calculation is generally required before the Agency files an administrative complaint or refers a civil action to the Department of Justice. The penalty

calculation should be revised as relevant new information is discovered during the course of the litigation. The penalty calculation should be reviewed periodically (e.g.,on the anniversary of when the complaint was filed) to determine if any revisions to the calculation are necessary.

IV. PENALTY CALCULATION METHODOLOGY

Before proceeding to calculate the settlement penalty, Agency staff should estimate the statutory maximum penalty in order to determine the potential maximum penalty liability of the discharger.[2] The penalty which the government seeks in settlement may not exceed this statutory maximum amount. Examples of how to calculate the statutory maximum are set forth in Attachment 1. In general, the statutory maximum penalty for violations of an effluent limit for a period longer than one day includes a separate penalty for each day in the time period (assuming there was a discharge on each day).

The settlement penalty is calculated based on this formula:

Penalty = Economic Benefit + Gravity +/- Gravity Adjustment Factors - Litigation Considerations - Ability to Pay - Supplemental Environmental Projects.

Each component of the penalty calculation is discussed below. A worksheet summarizing the penalty calculation is included as Attachment 2.

A. Economic Benefit

Consistent with EPA's February 1984 *Policy on Civil Penalties,* every effort should be made to calculate and recover the economic benefit of noncompliance. The objective of the economic benefit calculation is to place violators in the same financial position as they would have been if they had complied on time. Persons that violate the CWA are likely to have obtained an economic benefit as a result of delayed or completely avoided pollution control expenditures during the period of noncompliance. Commonly delayed and avoided CWA pollution control expenditures, include, but are not limited to:

- Monitoring and Reporting (including costs of the sampling and proper laboratory analysis);

- Capital equipment improvements or repairs, including engineering design, purchase, installation, and replacement;

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[2] This calculation of the statutory maximum penalty, done as part of the settlement penalty calculation, is a legal evaluation, subject to the attorney-work product privilege. This calculation is not intended for use in court.

- Operation and maintenance expenses (e.g. labor, power, chemicals) and other annual expenses; and

- One-time acquisitions (such as land purchase).

The standard method in settlement efforts for calculating the economic benefit from delayed and avoided pollution control expenditures is through the use of the Agency's BEN model. Refer to the "BEN User's Manual" (Office of Enforcement, December 1993, or any subsequent revision) for specific information on the operation and proper use of BEN. There is no minimum amount triggering the use of the BEN model. In estimating economic benefit using the BEN model, the benefit should be calculated from the first date of noncompliance, but EPA generally does not go back no more than five years prior to the date when the complaint should be filed.[3]

The BEN model will produce a valid estimate of the economic benefit from delayed and avoided compliance costs only if it is properly used.[4] Before using the BEN model you need a defensible theory of on-time compliance: that is, the pollution control system or measures the violator should have installed and operated earlier to have prevented the CWA violations at issue in the case.[5] As a general rule, the best evidence of what the violator should have done to prevent the violations, is what it eventually does (or will do) to achieve compliance.[6]

In some cases, the BEN model may not be an appropriate methodology for estimating economic benefit or will not capture the full scope of the economic benefit. For example, if the violator is a privately-owned regulated utility, the standard BEN model may not be appropriate. In this situation, the Agency should consider a wrongful profits analysis and seek to recover the profits and other competitive market benefits the violator obtained as a result of operating during the period of violation.[7] In another type of case, if the violator decides that its "method of

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[3] The five year guideline for when the BEN and gravity calculations starts is a policy decision. Legally, there is nothing that prevents EPA from calculating economic benefit or gravity from the first date of violation, even if that is more than five years before the complaint is filed, as long as the statutory maximum penalty (calculated pursuant to the five year statute of limitations) exceeds the settlement penalty amount.

[4] The BEN model does not calculate the "competitive advantage" benefits a firm may have obtained as a result of operating in violation of the law. Such benefits include profits and increases in market share from selling goods and services during the period of violation.

[5] The BEN model is comparing the compliance costs the violator would have paid if it had complied on-time, versus the usually smaller compliance costs it actually pays by complying late.

[6] See BEN User's Manual, December 1993, page 6-2.

[7] Regions should consult Headquarters for how to conduct this analysis; a financial consultant is likely to be needed.

compliance" is to cease operations at the facility, conducting a BEN analysis may be complicated.[8] In a few unusual cases, economic benefit may be negative: this means, e.g., operating the old inefficient treatment system was more expensive than purchasing and operating a new, more efficient treatment system. When economic benefit is negative, the settlement calculation enters zero as the economic benefit.

B. Gravity Component

The gravity calculation methodology is based upon a logical scheme and criteria that quantifies the gravity of the violation based upon the CWA and its regulatory programs. Every reasonable effort must be made to calculate and recover a gravity component in addition to the economic benefit component. As EPA's February 1984 *Policy on Civil Penalties,* states on page 4:

> The removal of the economic benefit of noncompliance only places the violator in the same position as he would have been if compliance had been achieved on time. Both deterrence and fundamental fairness require that the penalty include an additional amount to ensure that the violator is economically worse off than if [he] had obeyed the law.

The gravity component of the penalty is calculated for each month in which there was a violation. The total gravity component for the penalty calculation equals the sum of each monthly gravity component. The monthly gravity formula is:

Monthly gravity component = (1 + A + B + C + D) x $1,000.

The four gravity factors -- A, B, C, and D -- are considered for each month in which there were one or more violations. Values are assigned to each of the four factors as described in the text and tables below. In performing the gravity calculation, the monthly gravity component is calculated from the first date of noncompliance up to when the violations ceased or the date the complaint is expected to be filed, but EPA has the option to start the gravity calculation no more than five years prior to the date when the complaint should be filed. (See footnote #4.) In cases with continuing violations, the gravity calculation should be revised periodically to include additional months of violations that have occurred since the previous calculation.

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[8] In cases where a facility determines that it can only comply by ceasing operations, an appropriate BEN analysis would be to input the savings obtained from the delayed closure costs and the avoided costs of not treating the wastewater during the period of noncompliance. See Appendix B in BEN User's Manual. If it is not possible to estimate these avoided treatment costs, then a wrongful profit analysis is necessary.

"A" -- Significance of Violation (Monthly Range 0 to 20). This factor is based on the degree of exceedance of the most significant effluent limit violation in each month. Values for this factor are selected from within designated ranges; violations of toxic monthly effluent limits are weighted most heavily. Values are selected using the table below based on the effluent value which yields the highest factor A value. Regions select a particular value for factor A within the designated range. For purposes of this table conventional and nonconventional pollutants include biochemical oxygen demand, chemical oxygen demand, total oxygen demand, dissolved oxygen, total organic carbon, total suspended solids, total dissolved solids, inorganic phosphorous compounds, inorganic nitrogen compounds, oil and grease, calcium, chloride, fluoride, magnesium, sodium, potassium, sulfur, sulfate, total alkalinity, total hardness, aluminum, cobalt, iron, vanadium and temperature. Factor A values for fecal coliform and pH, which are calculated using logarithmic scales, are calculated using the special scales at the bottom of the table. All other pollutants are classified as toxic pollutants.

If there were no effluent limit violations in a particular month, but there were other violations, then factor A is assigned a value of zero in that month's gravity calculation. In pretreatment cases in which the industrial user was not required to provide monthly compliance reports, and provided less frequent effluent data (e.g., in a 40 CFR §403.12(e) periodic compliance report), any effluent violations reported in the report are assumed to represent identical violations in each month of the reporting period for purposes of calculating gravity if there is substantial evidence supporting this assumption. Examples of such evidence are: (1) no pretreatment equipment was in operation during the period and (2) the production and treatment operations remained consistent during the period. This means the monthly gravity calculation, with a factor A value, should be repeated for all of the months covered by the report.[9] If there was no evidence indicating continuing violations throughout the period covered by the periodic compliance report, then a value for Factor A should be assigned only for the month in which the sampling occurred. If the industrial user did not notify the control authority and repeat the sampling after finding the effluent violation as required by 40 CFR §403.12(g)(2), then an appropriate value for gravity Factor D should be assigned for this notification or monitoring violation(s).

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[9] The pretreatment regulations, 40 CFR §403.12(g)(3), require the periodic compliance reports to contain data which "is representative of conditions occurring during the reporting period." For example, if an industrial user reports in its December (semi-annual) periodic compliance report that it violated the daily maximum cadmium limit by 150% in September, and this was the most significant effluent violation, using the Gravity Factor A Table, factor A will be assigned a value between 3 and 7 for each of the six months covered by the report (July - December) if, e.g., EPA had evidence that the facility lacked treatment equipment during that period and wastewater generating operations were consistent during the period.

GRAVITY FACTOR A -- SIGNIFICANCE OF THE VIOLATION

Select a value for factor A based on the effluent limit violated in the month which produces the highest range of values for factor A.

Percent by which effluent limit was exceeded:			Factor A Value Ranges	
Monthly Average	7-day Average	Daily Maximum	Toxic Pollutants	Conventional & Nonconventional Pollutants
1 - 20	1 - 30	1 - 50	1 - 3	0 - 2
21 - 40	31 - 60	51 - 100	1 - 4	1 - 3
41 - 100	61 - 150	101 - 200	3 - 7	2 - 5
101 - 300	151 - 450	201 - 600	5 - 15	3 - 6
301 - >	451 - >	601 - >	10 - 20	5 - 15

Percent Exceedance of Fecal Coliform Limit:	Standard Units above or below pH limit:	Factor A Value Ranges:
0 - 100	0 - .50	0 - 5
101 - 500	.51 - 2.0	2 - 8
501 - 5,000	2.01 - 3.0	4 - 10
5,001 - >	3.01 - 4.0	6 - 12
	4.01 - >	8 - 15

"B" -- Health and Environmental Harm (Monthly Range 0 to 50). A value for this factor is selected for each month in which one or more violations present actual or potential harm to human health or to the environment. Values are selected using the table below based on the type of actual or potential harm that yields the highest factor value.

GRAVITY FACTOR B -- HEALTH AND ENVIRONMENTAL HARM	
Type of Actual or Potential Harm	**Factor B Value Ranges**
Impact on Human Health (e.g., interference with drinking water supplies, harm or increased risks to subsistence fishing)	10 - 50
Impact on Aquatic Environment (or the POTW)	
Water quality-based effluent standard(s) or whole effluent toxicity limit violated	1 - 10
Fish kill, beach closing, restrictions on use of water body; or pass through or interference at the POTW caused by the IU discharge.	4 - 50
Other impact on aquatic environment	2 - 25

"C" -- Number of Effluent Limit Violations (Monthly Range 0 to 5). This factor is based on the total number of effluent limit violations each month. (Violations of interim limitations in administrative orders are not counted here, but included as part of recalcitrance.) In order to properly quantify the gravity of the violations, all effluent limit violations are considered and evaluated. Violations of different parameters at the same outfall are counted separately and violations of the same parameter at different outfalls are counted separately. The guidelines in Attachment 1 for calculating the statutory maximum penalty are generally not applicable for selecting the value for gravity factor C (e.g., violation of a weekly limit need not be calculated as 7 separate violations). A minimum factor C value of 1 is generally appropriate whenever there are violations of two or more different pollutants. Values for this factor may be selected by comparing the number of effluent limits exceeded with the number of effluent limits in the permit: e.g., if all of the limits in the permit were violated in a month, a value of 5 would be appropriate; if 50 percent of the limits in the permit were violated, a factor of 2 or 3 would be appropriate.

"D" -- Significance of Non-effluent Limit Violations. This factor has a value ranging from 0 (zero) to 70 and is based on the severity and number of the six different types of non-effluent limitation requirements violated each month. There are six types of non-effluent violations: 1) monitoring and reporting; 2) pretreatment program implementation; 3) sludge handling; 4) unauthorized discharges; 5) permit milestone schedules; and 7) other types of non-effluent violations. The value for factor D for each month in which there is a non-effluent limit violation is selected pursuant to the table on the next page. The factor D value for a given month is the sum of the highest value for each type of non-effluent limit violation.

With regards to monitoring and reporting violations, the failure to submit a report in a timely manner should generally not be treated as a continuing violation past the month in which the report is due. For example, if an industrial user fails to submit a baseline monitoring report as required by 40 CFR 403.12(b), this should be counted as a violation only in the month when the

report was due. Given the importance of such a report, if the violator fails to submit the report at all a factor D value of 5 or more may be appropriate for this violation.[10]

With regards to pretreatment program implementation violations, "key program activities" include: identifying all industrial users; issuing appropriate control mechanisms to all significant industrial users (SIUs); inspecting SIUs; enforcing industrial user self-monitoring; enforcing pretreatment standards (including local limits); submitting pretreatment reports to the approval authority; and failing to comply with other significant pretreatment program obligations. The 1989 *Guidance for Reporting and Evaluating POTW Noncompliance with Pretreatment Requirements* or subsequent revisions may be helpful in evaluating the seriousness of pretreatment program implementation violations.

As an example of calculating factor D for a given month, assume a discharger did not sample for 4 of the 8 parameters in its permit, the discharge monitoring report was submitted 20 days late, and there were several days of discharge of a process wastestream through an unauthorized outfall without any treatment. Using the factor D table, for Type 1, a value of 4 may be selected based on the failure to conduct sampling for half of the parameters; the delay in submitting sampling data is not considered since the other Type 1 violation produces a higher value. For the unauthorized discharge of the process wastestream, a value of 6 may be selected for Type 4. Since there are no Type 2, 3, 5, and 6 violations, a value of 0 is entered for each of these Types. Thus, the total value for factor D for this month is 10.

[10] The failure to provide the regulatory agency with required sampling data on the discharge is a very serious violation as this eliminates the government's ability to perform necessary oversight and allows the discharger to avoid the possible application of gravity factor A.

GRAVITY FACTOR D -- NON-EFFLUENT LIMIT VIOLATIONS	
THE FACTOR D VALUE FOR A GIVEN MONTH IS THE SUM OF THE HIGHEST VALUE FOR EACH TYPE OF NON-EFFLUENT LIMIT VIOLATION.	
Type and Extent of Violation	**Factor D Value Ranges**
1. Effluent Monitoring and Reporting Violations:	
Failure to conduct or submit adequate pollutant sampling data for 1 or more pollutant parameters (but not all parameters)	1 to 6
Failure to conduct or submit any required pollutant sampling data in a given month but with a reasonable belief that the facility was in compliance with applicable limits.	2 to 6
Failure to conduct or submit any required pollutant sampling data in a given month without a reasonable basis to believe that facility was otherwise in compliance with applicable limits.	6 to 10
Failure to conduct or submit whole effluent toxicity sampling data	4 to 10
Delay in submitting sampling data	0 to 5
Failure to submit a pretreatment baseline report, 90-day compliance report, or periodic compliance report (40 CFR 403.12(b), (d), or (e,) or failure to sample again after finding a violation (40 CFR 403.12(g)(2)).	2 to 8
Any other monitoring or reporting violation	0 to 10
2. Pretreatment Program Implementation Violations :	
All key program activities implemented, with some minor violations.	0 to 4
One or two key program activities not implemented	2 to 6
Many key program activities not implemented	4 to 8
Few if any program activities implemented	6 to 10
3. Failure to properly control, treat, or dispose of sludge	1 to 10
4. Unauthorized discharge: e.g., discharge through an unpermitted outfall, discharge of a wastestream not identified in the permit, sewer overflows, or spill (other than oil or §311 hazardous substance)	1 to 20
5. Violation of permit milestone schedule	1 to 10
6. Any other type of noneffluent limit violation	1 to 10

C. Gravity Adjustment Factors

In certain circumstances as explained below, the total monthly gravity amount may be adjusted by three factors: flow reduction factor (to reduce gravity); history of recalcitrance (to increase gravity); and the quick settlement reduction factor (to reduce gravity). The resulting figure -- benefit + (gravity +/- gravity adjustments) -- is the preliminary penalty amount.

Flow Reduction Factor for Small Facilities. The total monthly gravity amount may be reduced based on the flow of the facility. This factor is applicable to direct and indirect discharges, both municipal and non-municipals. Flow reduction percentages are selected using the table below. In order to ensure that these reductions are directed at small facilities (that are not otherwise part of large corporation), this gravity reduction does not apply to non-municipals if the facility or parent corporation employs more than 100 individuals.

FLOW REDUCTION FACTOR	
AVERAGE DAILY WASTEWATER DISCHARGE FLOW (in gallons per day)	PERCENTAGE REDUCTION FACTOR OF TOTAL GRAVITY
Less than 5,000	50
Between 5,000 and 9,999	40
Between 10,000 and 19,999	30
Between 20,000 and 29,999	20
Between 30,000 and 49,999	10
Between 50,000 and 99,999	5
100,000 and above	0 (i.e., no reduction)

History of Recalcitrance Adjustment Factor. The "recalcitrance" factor is used to increase the penalty based on a violator's bad faith, or unjustified delay in preventing, mitigating, or remedying the violation. Recalcitrance is also present if a violator failed to comply with an EPA issued administrative compliance order or a §308 information request, or with a prior state or local enforcement order. This factor is applied by multiplying the total gravity component by a percentage between 0 and 150. In administrative penalty actions, violations of administrative compliance orders are not included in the recalcitrance calculation (because EPA lacks the authority to seek penalties in the administrative forum for violations of administrative compliance orders).

A minimum recalcitrance factor of 10 percent is generally appropriate for each instance in which a violator fails to substantially comply in a timely manner with an administrative compliance

order ("AO"), a §308 information request, or a state enforcement order. Thus, if a particular discharger violated 3 AOs, a minimum recalcitrance factor of 30 percent is generally appropriate. If a violator completely fails to comply with an AO or §308 request, a recalcitrance factor of 20 percent may be appropriate for that failure, while if there were only minor violations of the AO or request, a recalcitrance factor of 5 percent may be appropriate for that violation.

Quick Settlement Adjustment Factor. In order to provide an extra incentive for violators to negotiate quickly and reasonably, and in recognition of a violator's cooperativeness, EPA may reduce the gravity amount by 10 percent if EPA expects the violator to settle quickly. For purposes of this reduction factor, in Class I administrative enforcement actions, a quick settlement is when the violator signs an administrative consent order resolving the violations within four months of the date the complaint was issued or within four months of when the government first sent the violator a written offer to settle the case, whichever date is earlier. In Class II administrative enforcement actions and judicial cases, the controlling time period is 6 and 12 months, respectively. If the violator is not able to sign the consent order within this time period, this adjustment does not apply.

Environmental Auditing Adjustment Factor. This interim revision of the Penalty Policy contains no explicit gravity adjustment factor for violators that conduct, or fail to conduct, environmental audits, disclose the results to the government, promptly correct the violations and remedy any harm. This interim revision of the Policy (and the original 1986 version), however, automatically produces smaller penalty amounts for violators who promptly remedy violations. This is because violators who promptly remedy violations will have shorter histories of violations and this automatically reduces both the economic benefit and gravity amounts. After the Agency completes its review of its environmental auditing policy, this Policy may be reissued with an explicit adjustment factor for this factor. In the interim, Regions, may with the advance approval of Headquarters, appropriately adjust the gravity amount based on the presence, or absence, of an environmental auditing program.

D. Litigation Considerations (to decrease preliminary penalty amount)

1. Overview. The government should evaluate every penalty with a view toward litigation and attempt to ascertain the maximum civil penalty the court or administrative judge is likely to award if the case proceeds to trial or hearing. Many enforcement cases may have mitigating factors, weaknesses or equitable problems that could be expected to persuade a court to assess a penalty less than the statutory maximum amount. The simple existence of weaknesses in a case, however, should not automatically result in a litigation consideration reduction of the preliminary bottom-line settlement penalty amount (economic benefit + gravity $\pm$ gravity adjustment factors). The government may reduce the amount of the civil penalty it will accept at settlement to reflect weaknesses in its case where the facts demonstrate a substantial likelihood that the government will not achieve a higher penalty at trial.

2. Legal Evaluation. The mere existence of weaknesses or limitations in a case should not result in a reduction of the preliminary bottom-line settlement penalty amount, unless the Agency determines that the preliminary settlement amount is more than EPA is likely to obtain at trial.[11] In evaluating potential litigation consideration reductions, EPA legal staff should: (a) Determine the statutory maximum penalty; (b) Evaluate what penalty the court might assess at trial given the particular strengths and weaknesses of the case; and, (c) Compare this amount to the preliminary settlement amount (benefit + gravity + recalcitrance).

While Agency legal staff cannot predict the exact penalty amount a court might assess at trial, case law indicates that a court should use the statutory maximum as its preliminary penalty figure, and then reduce that amount, as appropriate, using only the penalty assessment factors in §309(d) of the Act. Fitting the facts of EPA's enforcement case to the method adopted by the courts in recent CWA penalty decisions provides the Agency with the clearest method to estimate penalty litigation outcomes.[12]

3. Application. Adjustments for litigation considerations are taken on a factual basis specific to the case. Before a complaint is filed, the application of certain litigation considerations is almost always premature, since the Agency generally does not have enough information to fully evaluate litigation risk regarding the assigned judge's previous ruling on similar matters, the court's informed opinion, or witness performance. Other litigation considerations, including evidentiary matters, witness availability, and equitable defenses often may not be reliably demonstrated until after case filing. Reductions for these litigation considerations are more likely to be appropriate after the Agency obtains an informed view, through discovery and settlement activities, of the strengths and weaknesses in its case and how the specific court views penalties in the case. Pre-filing settlement negotiations are often helpful in identifying and evaluating litigation considerations, especially regarding potential equitable defenses, and thus reductions based on such litigation considerations may be appropriately taken before the complaint is filed. As a general rule, the greater the disparity between the maximum statutory penalty and the preliminary penalty amount, the less litigation considerations should affect the Agency's settlement position.

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[11] In many situations, weaknesses or limitations in a case are already accounted for in the preliminary penalty calculation. For example, the gravity calculation will be less in those circumstances in which the period of violation was brief, the exceedances of the limitations were small, the pollutants were not toxic, or there is no evidence of environmental harm. The economic benefit calculation also will be smaller when the violator has already returned to compliance since the period of violation will be shorter.

[12] The prevailing CWA case law on the assessment of penalties indicates that, in assessing a penalty, a court begins at the statutory maximum amount and reduces the penalty based on the specific factors set out in section 309(d) of the CWA. See Atlantic States Legal Foundation v. Tyson Foods, 897 F.2d 1128 (11th Cir. 1990). In contrast, settlement penalties calculated pursuant to this Policy build the Agency's bottom line negotiating position upward from zero, generally ending up with a figure orders of magnitude less than the statutory maximum penalty.

4. Possible Litigation Considerations. While there is no universal list of litigation considerations, the following factors may be appropriate in evaluating whether the preliminary settlement penalty exceeds the penalty the Agency would likely obtain at trial:

a. Known problems with the reliability or admissibility of the government's evidence proving liability or supporting a civil penalty;

b. The credibility, reliability, and availability of witnesses;[13]

c. The informed, expressed opinion of the judge assigned to the case (or person appointed by the judge to mediate the dispute), after evaluating the merits of the case.[14]

d. The record of the judge in any other environmental enforcement case presenting similar issues. (In contrast, the reputation of the judge, or the judge's general demeanor, without a specific penalty or legal statement on a similar case, is rarely sufficient as a litigation consideration.)

e. Statements made by federal, State or local regulators that may allow the respondent or defendant to credibly argue that it believed it was complying with the federal law under which EPA is seeking penalties.

f. The payment by the defendant of civil penalties for the same violations in a case brought by another plaintiff.[15]

g. The development of new, relevant case law.

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[13] The credibility and reliability of witnesses relates to their demeanor, reputation, truthfulness, and impeachability. For instance, if a government witness has made statements significantly contradictory to the position he is to support at trial, his credibility may be impeached by the respondent or defendant. The availability of a witness will affect the settlement bottom-line if the witness cannot be produced at trial; it does not relate to the inconvenience or expense of producing the witness at trial.

[14] This factor, except as provided below with respect to the record of the judge or other trier of fact, may not be applied in anticipation, or at the stage of initial referral, and should not be distorted by taking at face value what a judge attempting to encourage a settlement might say.

[15] If the defendant has previously paid civil penalties for the same violations to another plaintiff, this factor may be used to reduce the amount of the settlement penalty by no more than the amount previously paid for the same violations. (If the previous plaintiff was a State qualified to preempt federal enforcement under EPA's interpretation of Section 309(g)(6), EPA's complaint should not include counts already addressed by a penalty. See "Supplemental Guidance on Section 309(g)(6) (A) of the Clean Water Act," memorandum from Frederick F. Stiehl, Enforcement Counsel for Water, to Regional Counsels, March 5, 1993, and "Guidance on State Action Preempting Civil Penalty Enforcement Actions Under the Federal Clean Water Act, OE/OW, August 28, 1987.)

h. A blend of troublesome facts and weak legal arguments such that the Agency faces a significant risk of obtaining a nationally significant negative precedent at trial.

5. Not Litigation Considerations. In contrast to the above list of possible litigation considerations, the following items are not litigation considerations:

a. A generalized goal to avoid litigation or to avoid potential precedential areas of the law.[16]

b. A duplicative use of elements included or assumed elsewhere in the Penalty Policy, such as inability to pay, "good faith"[17], "lack of recalcitrance", or a lack of demonstrated environmental harm[18].

c. Off-the-record statements by the court, before it has had a chance to evaluate the specific merits of the case are, by themselves, not a reason to reduce the preliminary settlement penalty amount. (Compare with 4.c above.)

d. The fact that the receiving water is already polluted or that the water can assimilate additional pollution is not a litigation consideration.[19]

e. By itself, the failure of a regulatory agency to initiate a timely enforcement action is not a litigation consideration.[20]

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[16] A generalized desire to minimize litigation costs is not a litigation consideration.

[17] The efforts of the violator to achieve compliance or minimize the violations after EPA, a State or pretreatment control authority has initiated an enforcement action (i.e., an administrative or judicial enforcement action) do not constitute "good faith" efforts. If such efforts are undertaken before the regulatory agency initiates an enforcement response, the settlement penalty calculation already includes such efforts through a potentially smaller economic benefit amount, a shorter or less serious gravity component, or a lack of any recalcitrance. The Penalty Policy assumes all members of the regulated community will make good faith efforts both to achieve compliance and remedy violations when they occur; consequently the settlement penalty calculation begins at zero and builds upward, with no reductions for good faith. In contrast, the absence of good faith efforts provides the basis for increasing the penalty through use of the recalcitrance factor.

[18] The gravity calculation will reflect the lack of environmental harm. Courts have considered the extent of environmental harm associated with violations in determining the "seriousness of violations" pursuant to the factors in §309(d), and have used the absence of any demonstrated or discrete identified environmental harm to impose less than the statutory maximum penalty. Proof of environmental harm, however, is neither necessary for liability nor for the assessment of penalties.

[19] See, e.g., Natural Resources Defense Council v. Texaco Refining and Mktg., 800 F. Supp. 1, 24 (D. Del. 1992).

[20] See PIRG v. Powell Duffryn, 913 F. 2d 64, 80-81 (3rd Cir. 1990).

6. Approval of Litigation Considerations. The Agency recognizes that the quantitative evaluation of litigation considerations often reflects subjective legal opinions. Therefore, EPA Regions may reduce the preliminary penalty amount for litigation considerations for up to one-third of the net gravity amount (i.e., gravity as modified by the gravity adjustment factors) without Headquarters approval (where such approval would otherwise be required). Of course, such a reduction must be fully explained and maintained in the case file. This reduction is not applicable in municipal cases in which the tables in D.7 below are used.

7. Municipal Cases. In those cases against a municipality or other public entity (such as a sewer authority) in which the entity has failed to comply with the Clean Water Act but nevertheless did make good faith efforts to comply, the Agency may mitigate the preliminary penalty amount based on this national municipal litigation consideration. The preliminary penalty amount (economic benefit + gravity $\pm$ gravity adjustments) may be mitigated to no less than the cash penalty determined by operation of the two tables set forth below. In addition, the cash penalty amount established by the tables may be reduced based on compelling ability to pay considerations and by up to 40 percent for appropriate supplemental environmental projects. Reducing the cash penalty below the amount established by the national municipal litigation consideration (other than for ability to pay considerations or for 40 percent based on a SEP) requires compelling evidence of other considerations and the prior approval of Headquarters (even if Headquarters' approval of the settlement would otherwise not be required).

The national municipal litigation consideration is a discretionary factor and the Agency is under no obligation to use it in all municipal cases.[21] It should only be used if there is some evidence that the municipality made a good faith effort to comply. The national municipal litigation consideration is based on the economic benefit, environmental impact, duration and size of the facility, and is derived, in part, on the settlement penalties EPA has obtained from judicial municipal cases settled between October 1988 and December 1993. There are three steps to calculate a penalty using the national municipal litigation consideration tables.

1. Using Table A determine the economic benefit environmental impact factor amount. This dollar amount is found by selecting an appropriate value from the range in the appropriate cell in Table A. The economic benefit is the benefit previously calculated pursuant to section IV.A. above. Impact of the violations is based on the actual or potential (risk) of harm caused, in whole or part, by the violations.

2. Using Table B determine the population months of violations factor amount. This dollar amount is found by selecting an appropriate value from the range in the appropriate cell in Table B. The service population is the total population served by the violating

[21] The national municipal litigation consideration is primarily intended to apply in cases in which there has been a failure to timely construct treatment facilities or other capital projects; it may not be appropriate in pretreatment failure to implement cases.

POTW(s) during the period. The months of violation are the total number of months calculated pursuant to section IV.B above. (If the service population exceeds 3 million, the Table B value is found by combining values from multiple rows. For example, if the service population was 4.5 million, the factor B penalty contribution would be the sum of a value selected from the appropriate cell in the 1,000,001 to 2,000,000 population row plus a value selected from the appropriate cell in the 2,000,001 to 3,000,000 population row.)

3. Sum the selected factor values from Tables A and B. Note that the factor values in Tables A and B are in thousands of dollars.

NATIONAL MUNICIPAL LITIGATION CONSIDERATION -- TABLE A

ECONOMIC BENEFIT ENVIRONMENTAL IMPACT FACTOR IN THOUSANDS OF DOLLARS

IMPACT OF VIOLATIONS ON HUMAN HEALTH OR THE ENVIRONMENT	ECONOMIC BENEFIT RANGES IN THOUSANDS OF DOLLARS								
	.001 to 50	50 to 100	100 to 250	250 to 1,000	1,000 to 2,000	2,000 to 5,000	5,000 to 10,000	10,000 to 25,000	greater than 25,000
No actual or potential harm.	6 to 9	11 to 15	17 to 23	32 to 43	49 to 67	75 to 103	110 to 151	167 to 230	283 to 389
Minor actual or potential harm (e.g., water quality-based effluent or whole effluent toxicity limit violated).	9 to 11	16 to 19	25 to 29	47 to 55	73 to 86	112 to 131	164 to 192	251 to 293	424 to 495
Moderate actual or potential harm (e.g., fish kill, beach closing, restrictions on use of water body, raw sewage discharges).	13 to 14	22 to 25	33 to 38	63 to 71	98 to 110	150 to 168	219 to 246	335 to 376	566 to 636
Severe actual or potential harm (e.g., repeated beach closings, interference with drinking water supplies).	17 to 32	30 to 55	46 to 84	87 to 158	135 to 245	206 to 374	301 to 548	460 to 837	778 to 1,414

NATIONAL MUNICIPAL LITIGATION CONSIDERATION – TABLE B

POPULATION MONTHS OF VIOLATION FACTOR IN THOUSANDS OF DOLLARS

SERVICE POPULATION	MONTHS OF VIOLATION											
	1 to 6	7 to 12	13 to 18	19 to 24	25 to 30	31 to 36	37 to 42	43 to 48	49 to 54	55 to 60	61 to 66	66>
100 to 5,000	0 to 0.6	0 to 1.8	0.1 to 3	0.1 to 4.2	0.1 to 5.4	0.1 to 6.6	0.2 to 7.8	0.2 to 9	0.2 to 10.2	0.2 to 11.4	0.3 to 12.6	0.3 to 14
5,001 to 25,000	0.6 to 3	1.8 to 9	3 to 15	4.2 to 21	5.4 to 27	6.6 to 33	7.8 to 39	9 to 45	10.2 to 51	11.4 to 57	12.6 to 63	14 to 70
25,001 to 50,000	3 to 6	9 to 18	15 to 30	21 to 42	27 to 54	33 to 66	39 to 78	45 to 90	51 to 102	57 to 114	63 to 126	70 to 140
50,001 to 100,000	6 to 12	18 to 36	30 to 60	42 to 84	54 to 108	66 to 132	78 to 156	90 to 180	102 to 204	114 to 228	126 to 252	140 to 280
100,001 to 250,000	12 to 30	36 to 90	60 to 150	84 to 210	108 to 270	132 to 330	156 to 390	180 to 450	204 to 510	228 to 570	252 to 630	280 to 700
250,001 to 500,000	30 to 60	90 to 180	150 to 300	210 to 420	270 to 540	330 to 660	390 to 780	450 to 900	510 to 1,020	570 to 1,140	630 to 1,260	700 to 1,400
500,001 to 1,000,000	60 to 120	180 to 360	300 to 600	420 to 840	540 to 1,080	660 to 1,320	780 to 1,560	900 to 1,800	1,020 to 2,040	1,140 to 2,280	1,260 to 2,520	1,400 to 2,800
1,000,001 to 2,000,000	120 to 240	360 to 720	600 to 1,200	840 to 1,680	1,080 to 2,160	1,320 to 2,640	1,560 to 3,120	1,800 to 3,600	2,040 to 4,080	2,280 to 4,560	2,520 to 5,040	2,800 to 5,600
2,000,001 to 3,000,000	240 to 360	720 to 1,080	1,200 to 1,800	1,680 to 2,520	2,160 to 3,240	2,640 to 3,960	3,120 to 4,680	3,600 to 5,400	4,080 to 6,120	4,560 to 6,840	5,040 to 7,560	5,600 to 8,400

E. Ability to Pay (to decrease preliminary penalty amount)

The Agency typically does not request settlement penalties, which combined with the cost of the necessary injunctive relief, that are clearly beyond the financial capability of the violator. This means EPA should not seek a penalty that would seriously jeopardize the violator's ability to continue operations and achieve compliance, unless the violator's behavior has been exceptionally culpable, recalcitrant, threatening to human health or the environment, or the violator refuses to comply.

The adjustment for ability-to-pay may be used to reduce the settlement penalty to the highest amount that the violator can reasonably pay and still comply with the CWA. The violator has the primary burden of establishing the claim of inability to pay. The violator must submit the necessary information demonstrating actual inability to pay as opposed to unwillingness to pay. Further, the claim of inability to pay a penalty should not be confused with a violator's aversion to make certain adjustment in its operations in order to pay the penalty.[22]

If the violator is unwilling to cooperate in demonstrating its inability to pay the penalty, this adjustment should not be considered in the penalty calculation, because, without the cooperation of the violator, the Agency will generally not have adequate information to determine accurately the financial position of the violator. In some cases, the Agency may need to consult a financial expert to properly evaluate a violator's claim of inability to pay.

If the violator demonstrates an inability to pay the entire negotiated penalty in one lump sum (usually within 30 days of consent decree entry), a payment schedule should be considered. The penalty could be paid in scheduled installments with appropriate interest accruing on the delayed payments. The period allowed for such installment payments should generally not extend beyond three years.

If a payment schedule will not resolve the violator's ability-to-pay issue, as a last recourse, the Agency can reduce the amount it seeks in settlement to a more appropriate amount in situations in which inability-to-pay can be clearly documented and reasonably quantified.

In the case of municipalities, one quick way to evaluate whether there might be an ability to pay issue is to examine the most recent bond rating (within the past 5 years). If the bond rating is below BBB (Standard & Poor's rating scale) or below Baa (Moody's rating scale), the community may be in poor financial condition and a detailed financial evaluation by an appropriate expert may be necessary to determine whether the financial condition affects the ability to pay a penalty.

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[22] For example, a business may have to use funds that were previously designated to develop a new product line to pay a penalty and thus the new product line would be delayed. Similarly, a penalty could be paid using company funds that otherwise would have gone to pay its executives bonuses.

V. SUPPLEMENTAL ENVIRONMENTAL PROJECTS (SEPs)

Supplemental Environmental Projects (SEPs) are defined by EPA as environmentally beneficial projects which a violator undertakes, but is not otherwise legally required to perform, in exchange for favorable penalty consideration in settlement of an enforcement action. In order for a violator to receive a settlement penalty reduction in exchange for performing such a project, the project must conform with the EPA's SEP Policy, or be approved in advance by the Assistant Administrator[23]. A SEP may be allowed in a municipal case, even if the cash penalty is less than economic benefit, provided the cash penalty is no less than 60 percent of the amount provided in section IV.D.7. Use of SEPs in a particular case is entirely within the discretion of EPA, and the Department of Justice in judicial cases.

VI. OTHER TYPES OF PENALTIES

This Policy only establishes how the Agency expects to calculate the minimum penalty for which it would be willing to settle a case. The development of the penalty amount to plead in an administrative or judicial complaint is developed independent of this Policy. This Policy is not intended and should not be used as the basis for a penalty demand in a complaint, an administrative hearing or, a civil judicial trial. The Agency will not use this Penalty Policy in arguing for a penalty at trial or in an administrative penalty hearing.[24] In those cases which proceed to trial or an administrative hearing, the Agency should seek a penalty higher than that for which it is willing to settle.

If the "bottom-line" settlement penalty calculated pursuant to this Policy exceeds the maximum penalty that can be obtained in an administrative penalty action pursuant to §309(g) of the CWA, the Agency should instead proceed judicially.[25] In rare circumstances, the statutory maximum penalty may be less than the "bottom-line" settlement penalty in civil judicial cases; in such circumstances, the statutory maximum penalty should serve as the new "bottom-line" penalty.

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[23] See "EPA Policy on the Use of Supplemental Environmental Projects in Enforcement Settlements", transmitted on February 12, 1991 by the Assistant Administrator for Enforcement, or subsequent revisions.

[24] If that were to occur, then the defendant would have no incentive to settle with EPA. See *Guidance on the Distinctions Among Pleading, Negotiating, and Litigating Civil Penalties for Enforcement Cases Under the Clean Water Act,* OECM/OW, January 19, 1989.

[25] For further guidance on choosing between administrative and judicial enforcement options, see "Guidance on Choosing Among Clean Water Act Administrative, Civil and Criminal Enforcement Actions", which was Attachment 2 to the August 28, 1987 "Guidance Documents and Delegations for Implementation of Administrative Penalty Authorities Contained in 1987 Clean Water Act Amendments".

VII. DOCUMENTATION, APPROVALS, AND CONFIDENTIALITY

Each component of the settlement penalty calculation (including all adjustments and subsequent recalculations) must be clearly documented with supporting materials and written explanations in the case file. In all cases in which a settlement penalty may not comply with the provisions of this Policy, or in a case in which application of this Policy appears inappropriate, the penalty must be approved in advance by the EPA Assistant Administrator for Enforcement and Compliance Assurance.

Documentation and explanations of a particular settlement penalty calculation constitute confidential information that is exempt from disclosure under the Freedom of Information Act, is outside the scope of discovery, and is protected by various privileges, including the attorney-client privilege and the attorney work-product privilege. While individual settlement penalty calculations are confidential documents, this Policy is a public document and may be released to anyone upon request. Further, as part of settlement negotiations between the parties, the Agency may choose to release parts of the case-specific settlement calculations. The release of such information may only be used for settlement negotiations in the case at hand and, of course, may not be admitted into evidence in a trial or hearing. See Rule 408 of Federal Rules of Evidence.

This Policy is purely for the use of U.S. EPA enforcement personnel in settling cases. EPA reserves the right to change this Policy at any time, without prior notice, or to act at variance to this Policy. This Policy does not create any rights, implied or otherwise, in any third parties.

ATTACHMENT 1 TO INTERIM CWA SETTLEMENT PENALTY POLICY

EXAMPLES OF HOW TO CALCULATE STATUTORY MAXIMUM PENALTY

Violation scenario	Maximum statutory penalty*	Authority
Violation of daily maximum limit for pollutant A, on the 5th of January.	$25,000	Plain reading of CWA, § 309(d): "$25,000 per day for each violation"
Violation of daily maximum limit for pollutant A, on the 5th, 10th, and 15th of January.	$75,000	Plain reading of CWA, § 309(d): "$25,000 per day for each violation"
Violation of daily maximum limits for each of pollutants A and B, on the 5th of January.	$50,000	Tyson Foods and Powell Duffryn, as well as plain reading of CWA, § 309(d): "$25,000 per day for each violation"
Violation in January of weekly average for pollutant A.	$25,000 per day, multiplied by 7 days $175,000.	Tyson Foods, 897 F.2d at 1139. Also see, Gwaltney, 897 F. 2d at 314.
Violation in January of monthly average limit for pollutant A.	$25,000 per day, multiplied by 31 days in January = $775,000	Tyson Foods, 897 F.2d at 1139. Also see, Gwaltney, 897 F. 2d at 314.
Violation in January of monthly average limit for pollutant A, in which there is evidence that there were no discharges on 4 days (e.g. plant shut down on Sundays).	$25,000 per day, multiplied by 27 days in January = $675,000	Natural Resources Defense Council v. Texaco , 2 F.3d 493, 507-508 (3rd Cir. 1993).
Violation in January of monthly average limits for both pollutants A and B.	$50,000 per day, multiplied by 31 days in January, = $1,550,000	Tyson Foods, 897 F.2d at 1140, footnote 22
Violation in January of monthly average limit for pollutant A, and of daily maximum limit for pollutant B on January 5th and 15th.	$775,000 for pollutant A, + $50,000 ($25,000 per day x 2) for pollutant B, = $825,000	Tyson Foods, 897 F.2d at 1140, under "The interaction of daily and monthly violations"
Violation in January of monthly average limit for pollutant A, and of daily maximum limit for pollutant A on Jan. 5th and 15th.	25,000 per day, multiplied by 31 days in January, = $775,000.	Tyson Foods, 897 F.2d at 1140, under "The interaction of daily and monthly violations"
Failure to properly monitor** for pollutant A on 4 required days in January.	$100,000.	Statutory language, CWA §309.

Violation scenario	Maximum statutory penalty*	Authority
Failure to properly monitor for pollutants A, B, and C on January 15.	$75,000.	Statutory language, CWA §309.
Failure to monitor for a monthly pollutant parameter.	$25,000 for each day in which the discharger was required to monitor for that pollutant.	Statutory language, CWA §309.
Failure to submit adequate discharge monitoring report on time (each failure to monitor for a particular pollutant is subject to a separate penalty calculation).	$25,000.	Statutory language, CWA §309.
Failure to timely submit a report or other document (each failure to timely complete an activity covered by the report is subject to a separate penalty calculation).	$25,000	Settlement policy discretion.

NOTES:

* For administrative penalty cases the penalty per day for each violation is $10,000 and may not exceed the total penalty amount allowed in a Class I or Class II administrative proceeding.

** For purposes of calculating penalties, the act of monitoring for a particular pollutant includes the sequence of events starting with the collection of the wastewater sample through completion of the analytical testing of the sample. The obligation to report the results of the monitoring is a separate act subject to a separate penalty calculation.

The guidelines set forth here reflect EPA's policy on how to calculate the statutory maximum penalty with regards to ensuring that all settlement penalties sought pursuant to the Penalty Policy do not exceed such statutory maximum. At trial or in a hearing, EPA reserves the right to calculate the statutory maximum pursuant to more aggressive assumptions.

ATTACHMENT 2 TO INTERIM CWA SETTLEMENT PENALTY POLICY

Case Name_____ Date_____

Prepared by _____ and _____ [attorney name].

SETTLEMENT PENALTY CALCULATION WORKSHEET

	STEP	AMOUNT
1.	Calculate Statutory Maximum Penalty (period of violations from ____ through ____)	
2.	Economic Benefit (attach BEN printouts, with explanations for calculations)	
3.	Total of Monthly Gravity Amounts	
4.	Economic Benefit + Gravity (lines 2 + 3)	
5.	Gravity Adjustments	
	a. Flow Reduction Factor ___ (0 to 50%) X line 3	
	b. Recalcitrance Factor ___ (0 to 150%) X line 3	
	c. Quick Settlement Reduction __ (0 or 10%) X line 3	
	d. Total gravity adjustments (negative amount if net gravity reduction) (lines 5.b. - 5.c - 5.a)	
6.	Preliminary Penalty Amount (lines 4 + 5.d)	
7.	Litigation Consideration Reduction (if any)	
8.	Ability to pay reduction (if any)	
9.	Reduction for Supplemental Environmental Projects (if any)	
10.	**Bottom-line Cash Settlement Penalty** (Line 6 less lines 7, 8 and 9. Or, if applicable, amount calculated by national municipal litigation consideration in §IV.D.6, less no more than 40% of that amount for appropriate SEPs.)	

Cody, Karen

From: Andrews, Blake <BAndrews@drummondco.com>
Sent: Friday, August 8, 2014 9:11 AM
To: Nagrani, Kavita
Cc: Johnson, Alenda E.; Poling, W. Mark; Jones, Curt
Subject: RE: ABC Proposed Penalty Settlement Documents
Attachments: Proposed Penalty Order for ABC Coke - ABC Changes 8-8-14.docx

Kavita-

Attached is the proposed order with a few changes from ABC. If we need to discuss the changes, please let me know.

Blake

From: Nagrani, Kavita [mailto:Nagrani.Kavita@epa.gov]
Sent: Wednesday, August 06, 2014 4:07 PM
To: Andrews, Blake
Cc: Johnson, Alenda E.
Subject: ABC Proposed Penalty Settlement Documents

Hi Blake,

Attached is a draft Consent Agreement and Final Order (CAFO), to potentially resolve a civil penalty with ABC Coke. We did decide to wait until after today's call to seek management's approval on this document, so that is currently pending. As a result, there is a possibility our management will request some changes to this document, in which case I will let you know of any additional changes. Otherwise, as I mentioned, this is a pretty boiler-plate document, but please let me know ASAP if you see something that you think we need to change. We did include many of the facts that previously were in the Administrative Order on Consent (AOC), so the beginning of the document will look familiar.

Also, I am attaching a PDF of the 1995 Interim Penalty Policy that was used to calculate the penalty numbers for this case.

Please let me know if you have any other questions or concerns. Thanks!

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4

IN THE MATTER OF:	**) ADMINISTRATIVE) ORDER ON CONSENT**
ABC COKE DIVISION THE DRUMMOND COMPANY BIRMINGHAM, ALABAMA	**) DOCKET NO. CWA-04-2014-4507(b)**
PROCEEDING UNDER SECTION 309(a) OF THE CLEAN WATER ACT, 33 U.S.C. § 1319(a) NPDES PERMIT NO. AL0003417	)

ADMINISTRATIVE ORDER ON CONSENT

I. STATUTORY AUTHORITY

1. This is a civil penalty proceeding pursuant to Section 309(g)(2)(A) of the Clean Water Act ("CWA"), 33 U.S.C. § 1319(g)(2)(A), and the *Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, Issuance of Compliance or Corrective Action Orders and the Revocation, Termination or Suspension of Permits*, including Subpart I, published at 64 Fed. Reg. 40176 (July 23, 1999), and codified at 40 Code of Federal Regulations ("C.F.R.") Part 22.

2. The authority to take action under Section 309(g)(2)(A) of the CWA, 33 U.S.C. § 1319(g)(2)(A), is vested in the Administrator of the United States Environmental Protection Agency ("EPA"). The Administrator has delegated this authority to the Regional Administrator Region 4, who in turn has re-delegated this authority to the Director of the Water Protection Division, who in turn has delegated this authority to the Chief of the Clean Water Enforcement Branch of EPA Region 4 ("Complainant").

II. ALLEGATIONS

3. ABC Coke Division is a part of Drummond Company, Inc. ("Respondent"), which is a corporation duly organized and existing under the laws of the State of Alabama and is a "person" within the meaning of Section 502(5) of the CWA, 33 U.S.C. § 1362(5).

4. At all times relevant to this action, the Respondent owned and/or operated a Biological Treatment Facility ("BTF"), located in Jefferson County at Railroad Street in Birmingham, Alabama.

5. To accomplish the objectives of the CWA, defined in Section 101(a) of the CWA, 33 U.S.C. § 1251(a), to restore and maintain the chemical, physical and biological integrity of the nation's waters, Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of pollutants by any person into waters of the United States except as in compliance with a National Pollutant Discharge Elimination System ("NPDES") permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342.

6. Section 402 of the CWA, 33 U.S.C. § 1342, establishes an NPDES Permit Program authorizing the EPA or authorized states to administer the NPDES Permit Program, including the issuance of NPDES permits allowing for the discharge of pollutants into navigable waters subject to specific terms and conditions. The EPA has granted the State of Alabama through the Department of Environmental Management ("ADEM") approval to issue NPDES permits pursuant to Section 402(b) of the CWA.

7. The BTF is operating under NPDES Permit No. AL0003417 ("Permit"), issued on March 3, 2009, and was administratively continued on March 31, 2014.

8. The Permit authorizes discharge of treated process wastewater and stormwater from coke making operations through outfall DSN 001 and discharge of stormwater runoff from the coal and coke yard through outfall DSN 002. Monitoring requirements in the Permit applicable to DSN 002 require Respondent to monitor constituents that would indicate a discharge of any process related pollutants from the coal and coke yard.

9. On August 13-16, 2012, the EPA conducted a Compliance Evaluation Inspection ("CEI") of the BTF and the industrial site to evaluate the Respondent's compliance with the Permit and the CWA. The CEI identified deficiencies related to preservation methods used to analyze samples, Best Management Practice deficiencies related to the stormwater controls and four non-stormwater discharges draining to the stormwater retention pond, which captures the stormwater runoff ultimately discharging through outfall DSN002. EPA found that one of those discharges was not specifically included in the Permit, and the others were not discharging in accordance with the terms of the Permit.

10. On May 10, 2013, the EPA sent a Letter of Concern ("LOC"), issued under the authority of Section 308(a) of the CWA, 33 U.S.C. § 1318(a), to the Respondent regarding alleged deficiencies identified during the inspection. The LOC also alleged two ammonia nitrogen effluent limit exceedances for the period covering January 1, 2010, through December 31, 2012. The LOC requested information on corrective actions planned or taken to address the deficiencies and effluent limit exceedances.

11. On June 17, 2013, the Respondent provided a response to the LOC. The response addressed all of the deficiencies with the exception that it stated that the Respondent believed the NPDES application allowed for these types of non-stormwater discharges and that three of these discharges were reflected as "miscellaneous" discharges in Respondent's application for the Permit. The fourth discharge reflected a release from a Jefferson County pipeline that has been repaired, such that the release has ceased.

12. On July 16, 2013, the EPA concluded its review of the LOC response and the Respondent's permit application and determined that Part V. of form 2F, which is entitled *Application for Permit to Discharge Storm Water Discharges Associated with Industrial Activity*, contains a certification that all non-stormwater discharges should be identified in either form 2C for discharge of wastewater or 2E for discharge of noncontact process water, and no such non-stormwater discharges are so identified on either of those forms.

13. Based on the above, EPA has determined that the Respondent has violated Section 301(a) of the CWA, 33 U.S.C. § 1311(a), in that the Respondent has discharged wastewater to a location not authorized by an NPDES permit. The EPA has determined that the Respondent has violated Section 301(a) of the CWA, 33 U.S.C. § 1311(a), and the Permit, by failing to comply with Part I.A. and Part II.E.2.a of the Permit.

14. In addition, upon conducting a subsequent record review of Respondent's last three years of compliance history, EPA determined that Respondent violated its whole effluent toxicity ("WET") limit for September 2013. Therefore, the EPA determined that the Respondent has violated Section 301(a) of the CWA, 33 U.S.C. § 1311(a), and the Permit, by failing to comply with Part I.A of the Permit.

III. STIPULATIONS AND FINDINGS

15. Complainant and Respondent have conferred for the purpose of settlement pursuant to 40 C.F.R. § 22.18 and desire to resolve this matter and settle the allegations described herein without a formal hearing. Therefore, without the taking of any evidence or testimony, the making of any argument, or the adjudication of any issue in this matter, and in accordance with 40 C.F.R. § 22.13(b), this Consent Agreement and Final Order ("CA/FO") will simultaneously commence and conclude this matter.

16. For the purposes of this CA/FO, Respondent admits the jurisdictional allegations set out above and neither admits nor denies the factual allegations set out above.

17. Respondent hereby waives its right to contest the allegations set out above and its right to appeal the Final Order accompanying this Consent Agreement.

18. Respondent consents to the assessment of and agrees to pay the civil penalty as set forth in this CA/FO and EPA is accepting such payment in full compromise, settlement and satisfaction of any and every civil penalty claim, demand and cause of action except as expressly otherwise provided hereinafter. Moreover, said payment of the civil penalty shall not be construed as an admission of liability, all liability being expressly denied by Respondent.

19. By signing this CA/FO, Respondent certifies that the information it has supplied concerning this matter was at the time of submission, and is, truthful, accurate, and complete for each such submission, response and statement. Respondent realizes that there are significant penalties for submitting false or misleading information, including the possibility of fines and/or imprisonment for knowing submission of such information.

20. The EPA reserves the right to assess and collect any and all civil penalties for any violation described herein to the extent that any information or certification provided by Respondent was materially false or inaccurate at the time such information or certification was provided to EPA.

21. Complainant and Respondent agree to settle this matter by their execution of this CA/FO. The parties agree that the settlement of this matter is in the public interest and that this CA/FO is consistent with the applicable requirements of the CWA.

IV. PAYMENT

22. Pursuant to Section 309(g)(2)(A) of the CWA, 33 U.S.C. § 1319(g)(2)(A), and considering the nature of the violations and other relevant factors, the EPA has determined and Respondent has agreed in settlement and compromise that Twenty Thousand Five Hundred Fifty Dollars ($20,550) is an appropriate civil penalty to settle this action.

23. Respondent shall submit payment of the penalty specified in the preceding paragraph via a cashier's or certified check, payable to the order of "Treasurer, United States of America." The check shall reference on its face the name of Respondent and the Docket Number of this CA/FO. Such payment shall be tendered to:

U.S. Environmental Protection Agency
Fines and Penalties
Cincinnati Finance Center
P.O. Box 979077
St. Louis, Missouri 63197-9000

24. At the time of payment, Respondent shall send a separate copy of the check, and a written statement that payment has been made in accordance with this CA/FO, to the following persons at the following addresses:

Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

and

Ms. Mary Mattox
U.S. Environmental Protection Agency, Region 4
Water Protection Division
Clean Water Enforcement Branch
Municipal and Industrial Enforcement Section
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

25. The penalty amount specified in Paragraph 22 above shall represent civil penalties assessed by the EPA and shall not be deductible for purposes of federal taxes.

26. Pursuant to Section 309(g)(9) of the CWA, 33 U.S.C. § 1319(g)(9), failure by the Respondent to pay the penalty assessed by the CA/FO in full by its due date may subject the Respondent to a civil action to collect the assessed penalty plus interest (at currently prevailing rates from the effective date of this CA/FO), attorney's fees, costs for collection proceedings and a quarterly nonpayment penalty for each quarter during which such failure to pay persists. Such nonpayment penalty shall be in an amount equal to twenty per cent (20%) of the aggregate amount of such penalty and nonpayment penalty which are unpaid as of the beginning of such quarter. In any such collection action, the validity, amount and appropriateness of the penalty and of this CA/FO shall not be subject to review.

V. GENERAL PROVISIONS

27. This CA/FO shall not relieve Respondent of its obligation to comply with all applicable provisions of federal, state, or local law, nor shall it be construed to be a ruling on, or determination of, any issue related to any federal, state, or local permit. Other than as expressed herein, compliance with this CA/FO shall not be a defense to any actions subsequently commenced pursuant to federal laws and regulations administered by the EPA.

28. Nothing in this CA/FO shall be construed as prohibiting, altering, or in any way limiting the ability of the United States to seek any other remedies or sanctions available by virtue of Respondent's violation of this CA/FO or other violation(s) of the statutes and regulations upon which this agreement is based, or for Respondent's violation of any federal or state statute, regulation or permit. The EPA shall not seek further corrective action or payment for the violations alleged in this CA/FO, if the Respondent complies with the payment required under Section IV of this CA/FO.

29. Except as otherwise set forth herein, this CA/FO constitutes a final settlement by Complainant and Respondent of all claims for civil penalties pursuant to the CWA with respect to only those violations alleged in this CA/FO. Nothing in this CA/FO is intended to nor shall be construed to operate in any way to resolve any criminal liability of the Respondent, or other liability resulting from violations that were not alleged in this CA/FO. Other than as expressed herein, Complainant does not waive any right to bring an enforcement action against Respondent for violation of any federal or state statute, regulation or permit, to initiate an action for imminent and substantial endangerment, or to pursue criminal enforcement.

30. Each undersigned representative of the parties to this CA/FO certifies that he or she is fully authorized to enter into the terms and conditions of this CA/FO and to execute and legally bind that party to it.

31. This CA/FO applies to and is binding upon Respondent and its officers, directors, employees, agents, successors and assigns.

32. Any change in the legal status of Respondent including, but not limited to, any

transfer of assets of real or personal property, shall not alter Respondent's responsibilities under this CA/FO.

33. Each party shall bear its own costs and attorney's fees in connection with the action resolved by this CA/FO.

34. In accordance with 40 C.F.R. § 22.5, the individuals below are authorized to receive service relating to this proceeding.

For Complainant:

Kavita K. Nagrani
Associate Regional Counsel
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960
(404) 562-9697

For Respondent:

Richard Owens
~~Facility Representative~~ President
~~Position~~
ABC Coke Division
Railroad Street
Birmingham, Alabama 35202

With a copy to:

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Blake Andrews
Assistant General Counsel
1000 Urban Center Drive
Birmingham, Alabama 35242

35. The parties acknowledge and agree that this CA/FO is subject to the requirements of 40 C.F.R. § 22.45(c)(4), which provides a right to petition to set aside a Consent Agreement and proposed Final Order based on comments received during the public comment period.

36. Pursuant to Section 309(g) of the CWA, 33 U.S.C. § 1319(g), and 40 C.F.R. §22.38(b), Complainant represents that the State of Alabama was provided a prior opportunity to consult with Complainant regarding this matter.

37. Effective upon signature of this CA/FO by Respondent, Respondent agrees that the time period commencing on the date of its signature and ending on the date the EPA receives from Respondent the payment required by this CA/FO shall not be included in computing the

running of any statute of limitations potentially applicable to any action brought by the EPA related to the matters addressed in this CA/FO and that, in any action brought by the EPA related to the matters addressed, Respondent will not assert, and may not maintain, any defense or claim based upon principles of statute of limitations, waiver, laches, estoppel, or other defense based on the passage of time during such period. If EPA gives notice to Respondent that it will not make this CA/FO effective, the statute of limitations shall begin to run again commencing ninety days after the date such notice is sent by the EPA.

VI. EFFECTIVE DATE

38. The effective date of this CA/FO shall be the date on which the CA/FO is filed with the Regional Hearing Clerk.

FOR THE RESPONDENT:

_____ Date:_____
ABC Coke Division of Drummond Company, Inc.
Name: _____
Print Title:_____

FOR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

_____ Date:_____
Denisse D. Diaz, Chief
Clean Water Enforcement Branch
Water Protection Division
U.S. EPA Region 4

Cody, Karen

From: Nagrani, Kavita
Sent: Monday, August 11, 2014 11:53 AM
To: Andrews, Blake
Cc: Johnson, Alenda E.
Subject: RE: ABC Proposed Penalty Settlement Documents
Attachments: Proposed Penalty Order for ABC Coke - to send to company on 8-11-14, with negotiated changes.docx

Hi Blake,

Attached is a revised, proposed penalty order, which reflects those changes that the EPA is willing to accept. You will see that we were able to make most of the changes that you proposed, but to the extent that we could not make all of the requested changes, I am providing a brief explanation below:

1. Changes to paragraph 8 – accepted.
2. Changes to paragraph 18 – We are able to accept that this penalty is being paid to settle any claim that is addressed in this CAFO. However, we do not have the ability to suggest that this CAFO may also settle claims that are outside of the scope of this order, which may include claims under the authority of other statutes. That could have broader effects that we do not intend by entering into this CAFO. We did also accept the second sentence in this paragraph whereby the Respondent does not admit to liability (and you will see that similar language is set forth already in paragraph 16 above), but we did not include the provision that the Respondent denies liability, as that would be inconsistent with our language in paragraph 16 and because it raises the question of why a Respondent would settle while also denying liability. In addition, we need to make sure that we have the jurisdiction to enter into such a settlement.
3. Changes to paragraph 22 – accepted.
4. Changes to paragraph 28 – We did accept the second change in this paragraph but did not include the first change, as we did find it confusing.
5. Changes to paragraph 29 – accepted.
6. Changes to paragraph 34 – accepted.

Our management is now reviewing the order and we can send you a clean copy for signature shortly (both via mail and also PDF). Please let me know if these modifications will be acceptable to your client, and if so, whether the company is able to return a signature page to the EPA by Thursday of this week. You can send me a copy of the signature page via email as long as the original is also placed in the mail. Thanks!

From: Nagrani, Kavita
Sent: Wednesday, August 06, 2014 5:07 PM
To: 'Andrews, Blake'
Cc: Johnson, Alenda E.
Subject: ABC Proposed Penalty Settlement Documents

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4

IN THE MATTER OF:	**) ADMINISTRATIVE**
	) ORDER ON CONSENT
	)
ABC COKE DIVISION	)
THE DRUMMOND COMPANY	)
BIRMINGHAM, ALABAMA	**) DOCKET NO. CWA-04-2014-4507(b)**
	)
PROCEEDING UNDER SECTION	)
309(a) OF THE CLEAN WATER ACT,	)
33 U.S.C. § 1319(a)	)
NPDES PERMIT NO. AL0003417	)

ADMINISTRATIVE ORDER ON CONSENT

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1. This is a civil penalty proceeding pursuant to Section 309(g)(2)(A) of the Clean Water Act ("CWA"), 33 U.S.C. § 1319(g)(2)(A), and the *Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, Issuance of Compliance or Corrective Action Orders and the Revocation, Termination or Suspension of Permits*, including Subpart I, published at 64 Fed. Reg. 40176 (July 23, 1999), and codified at 40 Code of Federal Regulations ("C.F.R.") Part 22.

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14. In addition, upon conducting a subsequent record review of Respondent's last three years of compliance history, EPA determined that Respondent violated its whole effluent toxicity ("WET") limit for September 2013. Therefore, the EPA determined that the Respondent has violated Section 301(a) of the CWA, 33 U.S.C. § 1311(a), and the Permit, by failing to comply with Part I.A of the Permit.

III. STIPULATIONS AND FINDINGS

15. Complainant and Respondent have conferred for the purpose of settlement pursuant to 40 C.F.R. § 22.18 and desire to resolve this matter and settle the allegations described herein without a formal hearing. Therefore, without the taking of any evidence or testimony, the making of any argument, or the adjudication of any issue in this matter, and in accordance with 40 C.F.R. § 22.13(b), this Consent Agreement and Final Order ("CA/FO") will simultaneously commence and conclude this matter.

16. For the purposes of this CA/FO, Respondent admits the jurisdictional allegations set out above and neither admits nor denies the factual allegations set out above.

17. Respondent hereby waives its right to contest the allegations set out above and its right to appeal the Final Order accompanying this Consent Agreement.

18. Respondent consents to the assessment of and agrees to pay the civil penalty as set forth in this CA/FO, and EPA is accepting such payment in full compromise, settlement and satisfaction of any and every civil penalty claim, demand, and cause of action set forth in this CA/FO. Moreover, said payment of the civil penalty shall not be construed as an admission of liability by Respondent.

19. By signing this CA/FO, Respondent certifies that the information it has supplied concerning this matter was at the time of submission, and is, truthful, accurate, and complete for each such submission, response and statement. Respondent realizes that there are significant penalties for submitting false or misleading information, including the possibility of fines and/or imprisonment for knowing submission of such information.

20. The EPA reserves the right to assess and collect any and all civil penalties for any violation described herein to the extent that any information or certification provided by Respondent was materially false or inaccurate at the time such information or certification was provided to EPA.

21. Complainant and Respondent agree to settle this matter by their execution of this CA/FO. The parties agree that the settlement of this matter is in the public interest and that this CA/FO is consistent with the applicable requirements of the CWA.

IV. PAYMENT

22. Pursuant to Section 309(g)(2)(A) of the CWA, 33 U.S.C. § 1319(g)(2)(A), and considering the nature of the violations and other relevant factors, the EPA has determined and Respondent has agreed in settlement and compromise that Twenty Thousand Five Hundred Fifty Dollars ($20,550) is an appropriate civil penalty to settle this action.

23. Respondent shall submit payment of the penalty specified in the preceding paragraph via a cashier's or certified check, payable to the order of "Treasurer, United States of America." The check shall reference on its face the name of Respondent and the Docket Number of this CA/FO. Such payment shall be tendered to:

U.S. Environmental Protection Agency
Fines and Penalties
Cincinnati Finance Center
P.O. Box 979077
St. Louis, Missouri 63197-9000

24. At the time of payment, Respondent shall send a separate copy of the check, and a written statement that payment has been made in accordance with this CA/FO, to the following persons at the following addresses:

Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

and

Ms. Mary Mattox
U.S. Environmental Protection Agency, Region 4
Water Protection Division
Clean Water Enforcement Branch
Municipal and Industrial Enforcement Section
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

25. The penalty amount specified in Paragraph 22 above shall represent civil penalties assessed by the EPA and shall not be deductible for purposes of federal taxes.

26. Pursuant to Section 309(g)(9) of the CWA, 33 U.S.C. § 1319(g)(9), failure by the Respondent to pay the penalty assessed by the CA/FO in full by its due date may subject the Respondent to a civil action to collect the assessed penalty plus interest (at currently prevailing rates from the effective date of this CA/FO), attorney's fees, costs for collection proceedings and a quarterly nonpayment penalty for each quarter during which such failure to pay persists. Such nonpayment penalty shall be in an amount equal to twenty per cent (20%) of the aggregate amount of such penalty and nonpayment penalty which are unpaid as of the beginning of such quarter. In any such collection action, the validity, amount and appropriateness of the penalty and of this CA/FO shall not be subject to review.

V. GENERAL PROVISIONS

27. This CA/FO shall not relieve Respondent of its obligation to comply with all applicable provisions of federal, state, or local law, nor shall it be construed to be a ruling on, or determination of, any issue related to any federal, state, or local permit. Other than as expressed herein, compliance with this CA/FO shall not be a defense to any actions subsequently commenced pursuant to federal laws and regulations administered by the EPA.

28. Nothing in this CA/FO shall be construed as prohibiting, altering, or in any way limiting the ability of the United States to seek any other remedies or sanctions available by virtue of Respondent's violation of this CA/FO or of the statutes and regulations upon which this agreement is based, or for Respondent's violation of any federal or state statute, regulation or permit. The EPA shall not seek further corrective action or payment for the violations alleged in this CA/FO, if the Respondent complies with the payment required under Section IV of this CA/FO.

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30. Each undersigned representative of the parties to this CA/FO certifies that he or she is fully authorized to enter into the terms and conditions of this CA/FO and to execute and legally bind that party to it.

31. This CA/FO applies to and is binding upon Respondent and its officers, directors, employees, agents, successors and assigns.

32. Any change in the legal status of Respondent including, but not limited to, any

transfer of assets of real or personal property, shall not alter Respondent's responsibilities under this CA/FO.

33. Each party shall bear its own costs and attorney's fees in connection with the action resolved by this CA/FO.

34. In accordance with 40 C.F.R. § 22.5, the individuals below are authorized to receive service relating to this proceeding.

For Complainant:

Kavita K. Nagrani
Associate Regional Counsel
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960
(404) 562-9697

For Respondent:

~~Facility Representative~~Richard Owens
President~~osition~~
ABC Coke Division
Railroad Street
Birmingham, Alabama 35202

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With a copy to:

Blake Andrews
Assistant General Counsel
1000 Urban Center Drive
Birmingham, Alabama 35242

35. The parties acknowledge and agree that this CA/FO is subject to the requirements of 40 C.F.R. § 22.45(c)(4), which provides a right to petition to set aside a Consent Agreement and proposed Final Order based on comments received during the public comment period.

36. Pursuant to Section 309(g) of the CWA, 33 U.S.C. § 1319(g), and 40 C.F.R. §22.38(b), Complainant represents that the State of Alabama was provided a prior opportunity to consult with Complainant regarding this matter.

37. Effective upon signature of this CA/FO by Respondent, Respondent agrees that the time period commencing on the date of its signature and ending on the date the EPA receives from Respondent the payment required by this CA/FO shall not be included in computing the running of any statute of limitations potentially applicable to any action brought by the EPA related

to the matters addressed in this CA/FO and that, in any action brought by the EPA related to the matters addressed, Respondent will not assert, and may not maintain, any defense or claim based upon principles of statute of limitations, waiver, laches, estoppel, or other defense based on the passage of time during such period. If EPA gives notice to Respondent that it will not make this CA/FO effective, the statute of limitations shall begin to run again commencing ninety days after the date such notice is sent by the EPA.

VI. EFFECTIVE DATE

38. The effective date of this CA/FO shall be the date on which the CA/FO is filed with the Regional Hearing Clerk.

FOR THE RESPONDENT:

_____ Date:_____
ABC Coke Division of Drummond Company, Inc.
Name: Richard Owens
Print Title: President

FOR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

_____ Date:_____
Denisse D. Diaz, Chief
Clean Water Enforcement Branch
Water Protection Division
U.S. EPA Region 4

Cody, Karen

From: Nagrani, Kavita
Sent: Monday, August 11, 2014 3:44 PM
To: Andrews, Blake
Cc: Johnson, Alenda E.
Subject: RE: ABC Proposed Penalty Settlement Documents
Attachments: Proposed Final CAFO 8-11-14.pdf

Hi Blake,

That sounds good. Also, our management has reviewed and approved the draft of the CAFO and has authorized me to send the CAFO to you as an offer ready for signature. Although some of the spacing has shifted a bit, this is the same order I sent you earlier today. You'll note that EPA is requesting the signed order to be returned by Thursday. Thanks!

From: Andrews, Blake [mailto:BAndrews@drummondco.com]
Sent: Monday, August 11, 2014 1:50 PM
To: Nagrani, Kavita
Cc: Johnson, Alenda E.
Subject: RE: ABC Proposed Penalty Settlement Documents

Kavita-

I am out of the office this afternoon, but will review and respond tomorrow morning.

Blake

From: Nagrani, Kavita [mailto:Nagrani.Kavita@epa.gov]
Sent: Monday, August 11, 2014 10:53 AM
To: Andrews, Blake
Cc: Johnson, Alenda E.
Subject: RE: ABC Proposed Penalty Settlement Documents

Hi Blake,

Attached is a revised, proposed penalty order, which reflects those changes that the EPA is willing to accept. You will see that we were able to make most of the changes that you proposed, but to the extent that we could not make all of the requested changes, I am providing a brief explanation below:

1. Changes to paragraph 8 – accepted.
2. Changes to paragraph 18 – We are able to accept that this penalty is being paid to settle any claim that is addressed in this CAFO. However, we do not have the ability to suggest that this CAFO may also settle claims that are outside of the scope of this order, which may include claims under the authority of other statutes. That could have broader effects that we do not intend by entering into this CAFO. We did also accept the second sentence in this paragraph whereby the Respondent does not admit to liability (and you will see that similar language is set forth already in paragraph 16 above), but we did not include the provision that the Respondent denies liability, as that would be inconsistent with our language in paragraph 16 and because it raises the question of why a Respondent would settle while also denying liability. In addition, we need to make sure that we have the jurisdiction to enter into such a settlement.
3. Changes to paragraph 22 – accepted.

4. Changes to paragraph 28 – We did accept the second change in this paragraph but did not include the first change, as we did find it confusing.
5. Changes to paragraph 29 – accepted.
6. Changes to paragraph 34 – accepted.

Our management is now reviewing the order and we can send you a clean copy for signature shortly (both via mail and also PDF). Please let me know if these modifications will be acceptable to your client, and if so, whether the company is able to return a signature page to the EPA by Thursday of this week. You can send me a copy of the signature page via email as long as the original is also placed in the mail. Thanks!

From: Nagrani, Kavita
Sent: Wednesday, August 06, 2014 5:07 PM
To: 'Andrews, Blake'
Cc: Johnson, Alenda E.
Subject: ABC Proposed Penalty Settlement Documents

Hi Blake,

Attached is a draft Consent Agreement and Final Order (CAFO), to potentially resolve a civil penalty with ABC Coke. We did decide to wait until after today's call to seek management's approval on this document, so that is currently pending. As a result, there is a possibility our management will request some changes to this document, in which case I will let you know of any additional changes. Otherwise, as I mentioned, this is a pretty boiler-plate document, but please let me know ASAP if you see something that you think we need to change. We did include many of the facts that previously were in the Administrative Order on Consent (AOC), so the beginning of the document will look familiar.

Also, I am attaching a PDF of the 1995 Interim Penalty Policy that was used to calculate the penalty numbers for this case.

Please let me know if you have any other questions or concerns. Thanks!

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

AUG 11 2014

OVERNIGHT

Mr. Richard Owens
President
ABC Coke Division
Post Office Box 10246
1000 Main Street
Birmingham, Alabama 35202

Re: Consent Agreement and Final Order No. CWA-04-2014-4507(b)
National Pollutant Discharge Elimination System Permit No.: AL0003417
Birmingham, Alabama

Dear Mr. Owens:

Please find enclosed the proposed Consent Agreement and Final Order (CA/FO), Docket No. CWA-04-2014-4507(b), which the U.S. Environmental Protection Agency Region 4 offers to enter into with the ABC Coke Division of the Drummond Company. If you agree with the terms of the enclosed CA/FO, please sign and return the document to Ms. Alenda Johnson, of my staff, within three days of your receipt of this letter.

After receiving the signed CA/FO, the EPA must place it on public notice in accordance with 40 Code of Federal Regulations Part 22. The public notice will be on the EPA Region 4 website at the following internet address: http://www.epa.gov/region4/water/wpeb. The comment period will remain open for 30 days. This CA/FO may not be finalized by the EPA until 10 days after the closure of the comment period. Once the public comment period is exhausted and the CA/FO is signed by the EPA, an executed copy will be sent to the Regional Judicial Officer. Upon approval by the Regional Judicial Officer, the CA/FO will be filed with the Regional Hearing Clerk who will mail a copy to you. The CA/FO will become effective upon filing with the Regional Hearing Clerk.

Please note that a settlement does not relieve your client of its obligation to comply with all applicable provisions of federal, state or local law, nor shall it be construed to be a ruling on, or determination of, any issue related to any federal, state or local permit.

Should you have any questions, please contact Ms. Kavita Nagrani, Assistant Regional Counsel, at (404) 562-9697.

Sincerely,

Maurice L. Horsey, IV, Chief
Municipal & Industrial Enforcement Section
Clean Water Enforcement Branch

Enclosure

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4

IN THE MATTER OF:	) ADMINISTRATIVE) ORDER ON CONSENT)
ABC COKE DIVISION THE DRUMMOND COMPANY BIRMINGHAM, ALABAMA	))) DOCKET NO. CWA-04-2014-4507(b))
PROCEEDING UNDER SECTION 309(a) OF THE CLEAN WATER ACT, 33 U.S.C. § 1319(a) NPDES PERMIT NO. AL0003417	))))

ADMINISTRATIVE ORDER ON CONSENT

I. STATUTORY AUTHORITY

1. This is a civil penalty proceeding pursuant to Section 309(g)(2)(A) of the Clean Water Act ("CWA"), 33 U.S.C. § 1319(g)(2)(A), and the *Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, Issuance of Compliance or Corrective Action Orders and the Revocation, Termination or Suspension of Permits*, including Subpart I, published at 64 Fed. Reg. 40176 (July 23, 1999), and codified at 40 Code of Federal Regulations ("C.F.R.") Part 22.

2. The authority to take action under Section 309(g)(2)(A) of the CWA, 33 U.S.C. § 1319(g)(2)(A), is vested in the Administrator of the United States Environmental Protection Agency ("EPA"). The Administrator has delegated this authority to the Regional Administrator Region 4, who in turn has re-delegated this authority to the Director of the Water Protection Division, who in turn has delegated this authority to the Chief of the Clean Water Enforcement Branch of EPA Region 4 ("Complainant").

II. ALLEGATIONS

3. ABC Coke Division is a part of Drummond Company, Inc. ("Respondent"), which is a corporation duly organized and existing under the laws of the State of Alabama and is a "person" within the meaning of Section 502(5) of the CWA, 33 U.S.C. § 1362(5).

4. At all times relevant to this action, the Respondent owned and/or operated a Biological Treatment Facility ("BTF"), located in Jefferson County at Railroad Street in Birmingham, Alabama.

5. To accomplish the objectives of the CWA, defined in Section 101(a) of the CWA, 33 U.S.C. § 1251(a), to restore and maintain the chemical, physical and biological integrity of the nation's waters, Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of pollutants by any person into waters of the United States except as in compliance with a National Pollutant Discharge Elimination System ("NPDES") permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342.

6. Section 402 of the CWA, 33 U.S.C. § 1342, establishes an NPDES Permit Program authorizing the EPA or authorized states to administer the NPDES Permit Program, including the issuance of NPDES permits allowing for the discharge of pollutants into navigable waters subject to specific terms and conditions. The EPA has granted the State of Alabama through the Department of Environmental Management ("ADEM") approval to issue NPDES permits pursuant to Section 402(b) of the CWA.

7. The BTF is operating under NPDES Permit No. AL0003417 ("Permit"), issued on March 3, 2009, and was administratively continued on March 31, 2014.

8. The Permit authorizes discharge of treated process wastewater and stormwater from coke making operations through outfall DSN 001 and discharge of stormwater runoff from the coal and coke yard through outfall DSN 002. Monitoring requirements in the Permit applicable to DSN 002 require Respondent to monitor constituents that would indicate a discharge of any process related pollutants from the coal and coke yard.

9. On August 13-16, 2012, the EPA conducted a Compliance Evaluation Inspection ("CEI") of the BTF and the industrial site to evaluate the Respondent's compliance with the Permit and the CWA. The CEI identified deficiencies related to preservation methods used to analyze samples, Best Management Practice deficiencies related to the stormwater controls and four non-stormwater discharges draining to the stormwater retention pond, which captures the stormwater runoff ultimately discharging through outfall DSN002. EPA found that one of those discharges was not specifically included in the Permit, and the others were not discharging in accordance with the terms of the Permit.

10. On May 10, 2013, the EPA sent a Letter of Concern ("LOC"), issued under the authority of Section 308(a) of the CWA, 33 U.S.C. § 1318(a), to the Respondent regarding alleged deficiencies identified during the inspection. The LOC also alleged two ammonia nitrogen effluent limit exceedances for the period covering January 1, 2010, through December 31, 2012. The LOC requested information on corrective actions planned or taken to address the deficiencies and effluent limit exceedances.

11. On June 17, 2013, the Respondent provided a response to the LOC. The response addressed all of the deficiencies with the exception that it stated that the Respondent believed the NPDES application allowed for these types of non-stormwater discharges and that three

of these discharges were reflected as "miscellaneous" discharges in Respondent's application for the Permit. The fourth discharge reflected a release from a Jefferson County pipeline that has been repaired, such that the release has ceased

12. On July 16, 2013, the EPA concluded its review of the LOC response and the Respondent's permit application and determined that Part V. of form 2F, which is entitled *Application for Permit to Discharge Storm Water Discharges Associated with Industrial Activity*, contains a certification that all non-stormwater discharges should be identified in either form 2C for discharge of wastewater or 2E for discharge of noncontact process water, and no such non-stormwater discharges are so identified on either of those forms.

13. Based on the above, EPA has determined that the Respondent has violated Section 301(a) of the CWA, 33 U.S.C. § 1311(a), in that the Respondent has discharged wastewater to a location not authorized by an NPDES permit. The EPA has determined that the Respondent has violated Section 301(a) of the CWA, 33 U.S.C. § 1311(a), and the Permit, by failing to comply with Part I.A. and Part II.E.2.a of the Permit.

14. In addition, upon conducting a subsequent record review of Respondent's last three years of compliance history, EPA determined that Respondent violated its whole effluent toxicity ("WET") limit for September 2013. Therefore, the EPA determined that the Respondent has violated Section 301(a) of the CWA, 33 U.S.C. § 1311(a), and the Permit, by failing to comply with Part I.A of the Permit.

III. STIPULATIONS AND FINDINGS

15. Complainant and Respondent have conferred for the purpose of settlement pursuant to 40 C.F.R. § 22.18 and desire to resolve this matter and settle the allegations described herein without a formal hearing. Therefore, without the taking of any evidence or testimony, the making of any argument, or the adjudication of any issue in this matter, and in accordance with 40 C.F.R. § 22.13(b), this Consent Agreement and Final Order ("CA/FO") will simultaneously commence and conclude this matter.

16. For the purposes of this CA/FO, Respondent admits the jurisdictional allegations set out above and neither admits nor denies the factual allegations set out above.

17. Respondent hereby waives its right to contest the allegations set out above and its right to appeal the Final Order accompanying this Consent Agreement.

18. Respondent consents to the assessment of and agrees to pay the civil penalty as set forth in this CA/FO, and EPA is accepting such payment in full compromise, settlement and satisfaction of any and every civil penalty claim, demand, and cause of action set forth in this CA/FO. Moreover, said payment of the civil penalty shall not be construed as an admission of liability by Respondent.

19. By signing this CA/FO, Respondent certifies that the information it has supplied concerning this matter was at the time of submission, and is, truthful, accurate, and complete for each such submission, response and statement. Respondent realizes that there are significant penalties for submitting false or misleading information, including the possibility of fines and/or imprisonment for knowing submission of such information.

20. The EPA reserves the right to assess and collect any and all civil penalties for any violation described herein to the extent that any information or certification provided by Respondent was materially false or inaccurate at the time such information or certification was provided to EPA.

21. Complainant and Respondent agree to settle this matter by their execution of this CA/FO. The parties agree that the settlement of this matter is in the public interest and that this CA/FO is consistent with the applicable requirements of the CWA.

IV. PAYMENT

22. Pursuant to Section 309(g)(2)(A) of the CWA, 33 U.S.C. § 1319(g)(2)(A), and considering the nature of the violations and other relevant factors, the EPA has determined and Respondent has agreed in settlement and compromise that Twenty Thousand Five Hundred Fifty Dollars ($20,550) is an appropriate civil penalty to settle this action.

23. Respondent shall submit payment of the penalty specified in the preceding paragraph via a cashier's or certified check, payable to the order of "Treasurer, United States of America." The check shall reference on its face the name of Respondent and the Docket Number of this CA/FO. Such payment shall be tendered to:

U.S. Environmental Protection Agency
Fines and Penalties
Cincinnati Finance Center
P.O. Box 979077
St. Louis, Missouri 63197-9000

24. At the time of payment, Respondent shall send a separate copy of the check, and a written statement that payment has been made in accordance with this CA/FO, to the following persons at the following addresses:

Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

and

Ms. Mary Mattox
U.S. Environmental Protection Agency, Region 4
Water Protection Division
Clean Water Enforcement Branch
Municipal and Industrial Enforcement Section
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

25. The penalty amount specified in Paragraph 22 above shall represent civil penalties assessed by the EPA and shall not be deductible for purposes of federal taxes.

26. Pursuant to Section 309(g)(9) of the CWA, 33 U.S.C. § 1319(g)(9), failure b the Respondent to pay the penalty assessed by the CA/FO in full by its due date may subject the Respondent to a civil action to collect the assessed penalty plus interest (at currently prevailing rates from the effective date of this CA/FO), attorney's fees, costs for collection proceedings and a quarterly nonpayment penalty for each quarter during which such failure to pay persists. Such nonpayment penalty shall be in an amount equal to twenty per cent (20%) of the aggregate amount of such penalty and nonpayment penalty which are unpaid as of the beginning of such quarter. In any such collection action, the validity, amount and appropriateness of the penalty and of this CA/FO shall not be subject to review.

V. GENERAL PROVISIONS

27. This CA/FO shall not relieve Respondent of its obligation to comply with all applicable provisions of federal, state, or local law, nor shall it be construed to be a ruling on, or determination of, any issue related to any federal, state, or local permit. Other than as expressed herein, compliance with this CA/FO shall not be a defense to any actions subsequently commenced pursuant to federal laws and regulations administered by the EPA.

28. Nothing in this CA/FO shall be construed as prohibiting, altering, or in any way limiting the ability of the United States to seek any other remedies or sanctions available by virtue of Respondent's violation of this CA/FO or of the statutes and regulations upon which this agreement is based, or for Respondent's violation of any federal or state statute, regulation or permit. The EPA shall not seek further corrective action or payment for the violations alleged in this CA/FO, if the Respondent complies with the payment required under Section IV of this CA/FO.

29. Except as otherwise set forth herein, this CA/FO constitutes a final settlement by Complainant and Respondent of all claims for civil penalties pursuant to the CWA with respect to only those violations alleged in this CA/FO. Nothing in this CA/FO is intended to nor shall be construed to operate in any way to resolve any criminal liability of the Respondent, or other liability resulting from violations that were not alleged in this CA/FO. Other than as expressed herein,

Complainant does not waive any right to bring an enforcement action against Respondent for violation of any federal or state statute, regulation or permit, to initiate an action for imminent and substantial endangerment, or to pursue criminal enforcement.

30. Each undersigned representative of the parties to this CA/FO certifies that he or she is fully authorized to enter into the terms and conditions of this CA/FO and to execute and legally bind that party to it.

31. This CA/FO applies to and is binding upon Respondent and its officers, directors, employees, agents, successors and assigns.

32. Any change in the legal status of Respondent including, but not limited to, any transfer of assets of real or personal property, shall not alter Respondent's responsibilities under this CA/FO.

33. Each party shall bear its own costs and attorney's fees in connection with the action resolved by this CA/FO.

34. In accordance with 40 C.F.R. § 22.5, the individuals below are authorized to receive service relating to this proceeding.

For Complainant:

Kavita K. Nagrani
Associate Regional Counsel
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960
(404) 562-9697

For Respondent:

Richard Owens
President
ABC Coke Division
Railroad Street
Birmingham, Alabama 35202

With a copy to:

Blake Andrews
Assistant General Counsel
1000 Urban Center Drive
Birmingham, Alabama 35242

35. The parties acknowledge and agree that this CA/FO is subject to the requirements of 40 C.F.R. § 22.45(c)(4), which provides a right to petition to set aside a Consent Agreement and proposed Final Order based on comments received during the public comment period.

36. Pursuant to Section 309(g) of the CWA, 33 U.S.C. § 1319(g), and 40 C.F.R. §22.38(b), Complainant represents that the State of Alabama was provided a prior opportunity to consult with Complainant regarding this matter.

37. Effective upon signature of this CA/FO by Respondent, Respondent agrees that the time period commencing on the date of its signature and ending on the date the EPA receives from Respondent the payment required by this CA/FO shall not be included in computing the running of any statute of limitations potentially applicable to any action brought by the EPA related to the matters addressed in this CA/FO and that, in any action brought by the EPA related to the matters addressed, Respondent will not assert, and may not maintain, any defense or claim based upon principles of statute of limitations, waiver, laches, estoppel, or other defense based on the passage of time during such period. If EPA gives notice to Respondent that it will not make this CA/FO effective, the statute of limitations shall begin to run again commencing ninety days after the date such notice is sent by the EPA.

VI. EFFECTIVE DATE

38. The effective date of this CA/FO shall be the date on which the CA/FO is filed with the Regional Hearing Clerk.

FOR THE RESPONDENT:

_____ Date:_____

ABC Coke Division of Drummond Company, Inc.
Richard Owens
President

FOR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

_____ Date: _____

Denisse D. Diaz, Chief
Clean Water Enforcement Branch
Water Protection Division
U.S. EPA Region 4

Cody, Karen

From: Nagrani, Kavita
Sent: Friday, August 15, 2014 11:55 AM
To: 'Andrews, Blake'
Cc: Johnson, Alenda E.
Subject: Proposed change to heading of CAFO
Attachments: Proposed Penalty Order for ABC Coke - final - REVISED 8-15 with new heading.docx

Importance: High

Hi Blake,

As we prepare to publish for public comment the CAFO with ABC Coke, I noticed an error in the heading of the order. The heading reflects that this is an Administrative Order on Consent, rather than a Consent Agreement and Final Order. You will see that the phrase "Administrative Order on Consent" previously appeared twice in the heading, on page 1. I've replaced those two references to now say "Consent Agreement and Final Order" and "Final Order" – in those two locations. I've also removed the reference in the heading that we normally add in our AOCs, indicating it is a 309(a) proceeding. That language does not appear in our CAFOs. Accordingly, I have revised this first page in only those three locations. Please review the attached, revised first page of the CAFO, which I propose to substitute for the first page that is attached to this document the company has already signed. Please let me know before the end of the day today if this change is acceptable, and I will simply substitute this page 1 for the page 1 that I previously sent to you. Thanks.

Kavita

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4

IN THE MATTER OF:	) **CONSENT AGREEMENT AND**
	) **FINAL ORDER**
	)
ABC COKE DIVISION	)
THE DRUMMOND COMPANY	)
BIRMINGHAM, ALABAMA	) **DOCKET NO. CWA-04-2014-4507(b)**
	)
	)
	)
	)
RESPONDENT.	)

FINAL ORDER

I. STATUTORY AUTHORITY

1. This is a civil penalty proceeding pursuant to Section 309(g)(2)(A) of the Clean Water Act ("CWA"), 33 U.S.C. § 1319(g)(2)(A), and the *Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, Issuance of Compliance or Corrective Action Orders and the Revocation, Termination or Suspension of Permits*, including Subpart I, published at 64 Fed. Reg. 40176 (July 23, 1999), and codified at 40 Code of Federal Regulations ("C.F.R.") Part 22.

2. The authority to take action under Section 309(g)(2)(A) of the CWA, 33 U.S.C. § 1319(g)(2)(A), is vested in the Administrator of the United States Environmental Protection Agency ("EPA"). The Administrator has delegated this authority to the Regional Administrator Region 4, who in turn has re-delegated this authority to the Director of the Water Protection Division, who in turn has delegated this authority to the Chief of the Clean Water Enforcement Branch of EPA Region 4 ("Complainant").

II. ALLEGATIONS

3. ABC Coke Division is a part of Drummond Company, Inc. ("Respondent"), which is a corporation duly organized and existing under the laws of the State of Alabama and is a "person" within the meaning of Section 502(5) of the CWA, 33 U.S.C. § 1362(5).

4. At all times relevant to this action, the Respondent owned and/or operated a Biological Treatment Facility ("BTF"), located in Jefferson County at Railroad Street in Birmingham, Alabama.

5. To accomplish the objectives of the CWA, defined in Section 101(a) of the CWA, 33 U.S.C. § 1251(a), to restore and maintain the chemical, physical and biological integrity of the nation's waters, Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of pollutants by any person into waters of the United States except as in compliance with a National Pollutant Discharge Elimination System ("NPDES") permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342.

6. Section 402 of the CWA, 33 U.S.C. § 1342, establishes an NPDES Permit Program authorizing the EPA or authorized states to administer the NPDES Permit Program, including the issuance of NPDES permits allowing for the discharge of pollutants into navigable waters subject to specific terms and conditions. The EPA has granted the State of Alabama through the Department of Environmental Management ("ADEM") approval to issue NPDES permits pursuant to Section 402(b) of the CWA.

7. The BTF is operating under NPDES Permit No. AL0003417 ("Permit"), issued on March 3, 2009, and was administratively continued on March 31, 2014.

8. The Permit authorizes discharge of treated process wastewater and stormwater from coke making operations through outfall DSN 001 and discharge of stormwater runoff from the coal and coke yard through outfall DSN 002. Monitoring requirements in the Permit applicable to DSN 002 require Respondent to monitor constituents that would indicate a discharge of any process related pollutants from the coal and coke yard.

9. On August 13-16, 2012, the EPA conducted a Compliance Evaluation Inspection ("CEI") of the BTF and the industrial site to evaluate the Respondent's compliance with the Permit and the CWA. The CEI identified deficiencies related to preservation methods used to analyze samples, Best Management Practice deficiencies related to the stormwater controls and four non-stormwater discharges draining to the stormwater retention pond, which captures the stormwater runoff ultimately discharging through outfall DSN002. EPA found that one of those discharges was not specifically included in the Permit, and the others were not discharging in accordance with the terms of the Permit.

10. On May 10, 2013, the EPA sent a Letter of Concern ("LOC"), issued under the authority of Section 308(a) of the CWA, 33 U.S.C. § 1318(a), to the Respondent regarding alleged deficiencies identified during the inspection. The LOC also alleged two ammonia nitrogen effluent limit exceedances for the period covering January 1, 2010, through December 31, 2012. The LOC requested information on corrective actions planned or taken to address the deficiencies and effluent limit exceedances.

11. On June 17, 2013, the Respondent provided a response to the LOC. The response addressed all of the deficiencies with the exception that it stated that the Respondent believed the NPDES application allowed for these types of non-stormwater discharges and that three

of these discharges were reflected as "miscellaneous" discharges in Respondent's application for the Permit. The fourth discharge reflected a release from a Jefferson County pipeline that has been repaired, such that the release has ceased.

12. On July 16, 2013, the EPA concluded its review of the LOC response and the Respondent's permit application and determined that Part V. of form 2F, which is entitled *Application for Permit to Discharge Storm Water Discharges Associated with Industrial Activity*, contains a certification that all non-stormwater discharges should be identified in either form 2C for discharge of wastewater or 2E for discharge of noncontact process water, and no such non-stormwater discharges are so identified on either of those forms.

13. Based on the above, EPA has determined that the Respondent has violated Section 301(a) of the CWA, 33 U.S.C. § 1311(a), in that the Respondent has discharged wastewater to a location not authorized by an NPDES permit. The EPA has determined that the Respondent has violated Section 301(a) of the CWA, 33 U.S.C. § 1311(a), and the Permit, by failing to comply with Part I.A. and Part II.E.2.a of the Permit.

14. In addition, upon conducting a subsequent record review of Respondent's last three years of compliance history, EPA determined that Respondent violated its whole effluent toxicity ("WET") limit for September 2013. Therefore, the EPA determined that the Respondent has violated Section 301(a) of the CWA, 33 U.S.C. § 1311(a), and the Permit, by failing to comply with Part I.A of the Permit.

III. STIPULATIONS AND FINDINGS

15. Complainant and Respondent have conferred for the purpose of settlement pursuant to 40 C.F.R. § 22.18 and desire to resolve this matter and settle the allegations described herein without a formal hearing. Therefore, without the taking of any evidence or testimony, the making of any argument, or the adjudication of any issue in this matter, and in accordance with 40 C.F.R. § 22.13(b), this Consent Agreement and Final Order ("CA/FO") will simultaneously commence and conclude this matter.

16. For the purposes of this CA/FO, Respondent admits the jurisdictional allegations set out above and neither admits nor denies the factual allegations set out above.

17. Respondent hereby waives its right to contest the allegations set out above and its right to appeal the Final Order accompanying this Consent Agreement.

18. Respondent consents to the assessment of and agrees to pay the civil penalty as set forth in this CA/FO, and EPA is accepting such payment in full compromise, settlement and satisfaction of any and every civil penalty claim, demand, and cause of action set forth in this CA/FO. Moreover, said payment of the civil penalty shall not be construed as an admission of liability by Respondent.

19. By signing this CA/FO, Respondent certifies that the information it has supplied concerning this matter was at the time of submission, and is, truthful, accurate, and complete for each such submission, response and statement. Respondent realizes that there are significant penalties for submitting false or misleading information, including the possibility of fines and/or imprisonment for knowing submission of such information.

20. The EPA reserves the right to assess and collect any and all civil penalties for any violation described herein to the extent that any information or certification provided by Respondent was materially false or inaccurate at the time such information or certification was provided to EPA.

21. Complainant and Respondent agree to settle this matter by their execution of this CA/FO. The parties agree that the settlement of this matter is in the public interest and that this CA/FO is consistent with the applicable requirements of the CWA.

IV. PAYMENT

22. Pursuant to Section 309(g)(2)(A) of the CWA, 33 U.S.C. § 1319(g)(2)(A), and considering the nature of the violations and other relevant factors, the EPA has determined and Respondent has agreed in settlement and compromise that Twenty Thousand Five Hundred Fifty Dollars ($20,550) is an appropriate civil penalty to settle this action.

23. Respondent shall submit payment of the penalty specified in the preceding paragraph via a cashier's or certified check, payable to the order of "Treasurer, United States of America." The check shall reference on its face the name of Respondent and the Docket Number of this CA/FO. Such payment shall be tendered to:

U.S. Environmental Protection Agency
Fines and Penalties
Cincinnati Finance Center
P.O. Box 979077
St. Louis, Missouri 63197-9000

24. At the time of payment, Respondent shall send a separate copy of the check, and a written statement that payment has been made in accordance with this CA/FO, to the following persons at the following addresses:

Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

and

Ms. Mary Mattox
U.S. Environmental Protection Agency, Region 4
Water Protection Division
Clean Water Enforcement Branch
Municipal and Industrial Enforcement Section
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

25. The penalty amount specified in Paragraph 22 above shall represent civil penalties assessed by the EPA and shall not be deductible for purposes of federal taxes.

26. Pursuant to Section 309(g)(9) of the CWA, 33 U.S.C. § 1319(g)(9), failure by the Respondent to pay the penalty assessed by the CA/FO in full by its due date may subject the Respondent to a civil action to collect the assessed penalty plus interest (at currently prevailing rates from the effective date of this CA/FO), attorney's fees, costs for collection proceedings and a quarterly nonpayment penalty for each quarter during which such failure to pay persists. Such nonpayment penalty shall be in an amount equal to twenty per cent (20%) of the aggregate amount of such penalty and nonpayment penalty which are unpaid as of the beginning of such quarter. In any such collection action, the validity, amount and appropriateness of the penalty and of this CA/FO shall not be subject to review.

V. GENERAL PROVISIONS

27. This CA/FO shall not relieve Respondent of its obligation to comply with all applicable provisions of federal, state, or local law, nor shall it be construed to be a ruling on, or determination of, any issue related to any federal, state, or local permit. Other than as expressed herein, compliance with this CA/FO shall not be a defense to any actions subsequently commenced pursuant to federal laws and regulations administered by the EPA.

28. Nothing in this CA/FO shall be construed as prohibiting, altering, or in any way limiting the ability of the United States to seek any other remedies or sanctions available by virtue of Respondent's violation of this CA/FO or of the statutes and regulations upon which this agreement is based, or for Respondent's violation of any federal or state statute, regulation or permit. The EPA shall not seek further corrective action or payment for the violations alleged in this CA/FO, if the Respondent complies with the payment required under Section IV of this CA/FO.

29. Except as otherwise set forth herein, this CA/FO constitutes a final settlement by Complainant and Respondent of all claims for civil penalties pursuant to the CWA with respect to only those violations alleged in this CA/FO. Nothing in this CA/FO is intended to nor shall be construed to operate in any way to resolve any criminal liability of the Respondent, or other liability resulting from violations that were not alleged in this CA/FO. Other than as expressed herein,

Complainant does not waive any right to bring an enforcement action against Respondent for violation of any federal or state statute, regulation or permit, to initiate an action for imminent and substantial endangerment, or to pursue criminal enforcement.

30. Each undersigned representative of the parties to this CA/FO certifies that he or she is fully authorized to enter into the terms and conditions of this CA/FO and to execute and legally bind that party to it.

31. This CA/FO applies to and is binding upon Respondent and its officers, directors, employees, agents, successors and assigns.

32. Any change in the legal status of Respondent including, but not limited to, any transfer of assets of real or personal property, shall not alter Respondent's responsibilities under this CA/FO.

33. Each party shall bear its own costs and attorney's fees in connection with the action resolved by this CA/FO.

34. In accordance with 40 C.F.R. § 22.5, the individuals below are authorized to receive service relating to this proceeding.

For Complainant:

Kavita K. Nagrani
Associate Regional Counsel
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960
(404) 562-9697

For Respondent:

Richard Owens
President
ABC Coke Division
Railroad Street
Birmingham, Alabama 35202

With a copy to:

Blake Andrews
Assistant General Counsel
1000 Urban Center Drive
Birmingham, Alabama 35242

35. The parties acknowledge and agree that this CA/FO is subject to the requirements of 40 C.F.R. § 22.45(c)(4), which provides a right to petition to set aside a Consent Agreement and proposed Final Order based on comments received during the public comment period.

36. Pursuant to Section 309(g) of the CWA, 33 U.S.C. § 1319(g), and 40 C.F.R. §22.38(b), Complainant represents that the State of Alabama was provided a prior opportunity to consult with Complainant regarding this matter.

37. Effective upon signature of this CA/FO by Respondent, Respondent agrees that the time period commencing on the date of its signature and ending on the date the EPA receives from Respondent the payment required by this CA/FO shall not be included in computing the running of any statute of limitations potentially applicable to any action brought by the EPA related to the matters addressed in this CA/FO and that, in any action brought by the EPA related to the matters addressed, Respondent will not assert, and may not maintain, any defense or claim based upon principles of statute of limitations, waiver, laches, estoppel, or other defense based on the passage of time during such period. If EPA gives notice to Respondent that it will not make this CA/FO effective, the statute of limitations shall begin to run again commencing ninety days after the date such notice is sent by the EPA.

VI. EFFECTIVE DATE

38. The effective date of this CA/FO shall be the date on which the CA/FO is filed with the Regional Hearing Clerk.

FOR THE RESPONDENT:

Date:_____

_____
ABC Coke Division of Drummond Company, Inc.
Richard Owens
President

FOR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

_____ Date:_____

Denisse D. Diaz, Chief
Clean Water Enforcement Branch
Water Protection Division
U.S. EPA Region 4

From: Osborn, Bill [mailto:bosborn@abccoke.com]
Sent: Tuesday, January 03, 2012 9:47 AM
To: Burgess, James
Subject: ABC Coke Drawings on Kippin Process

Mr. Burgess,

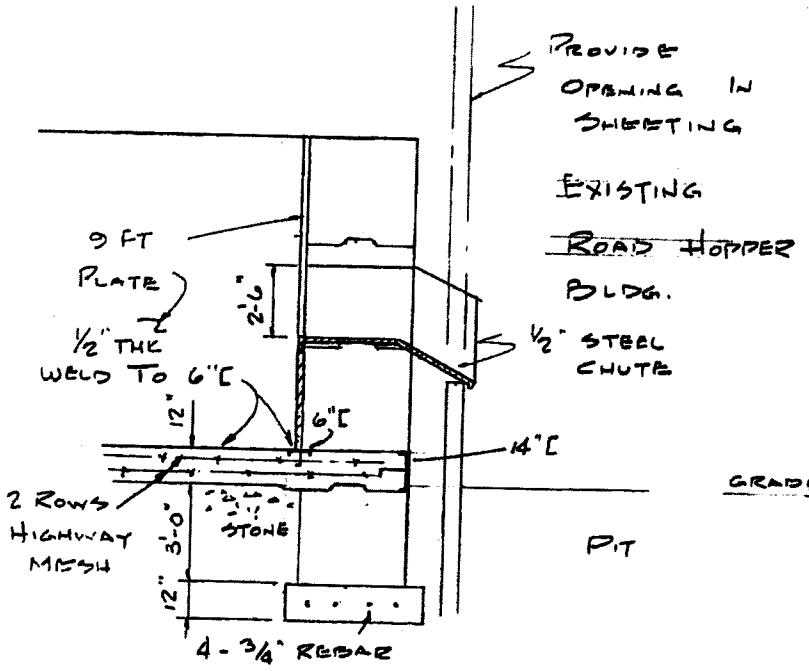
Attachment drawings are being submitted as received.

The "Concrete Pad" thickness is dependent on local soil conditions.

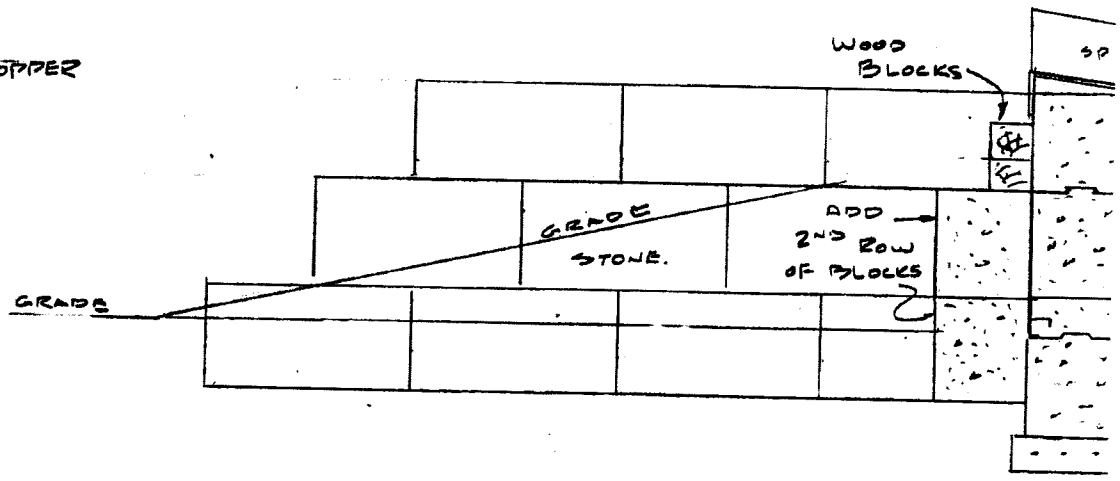
Thanks,

Bill Osborn

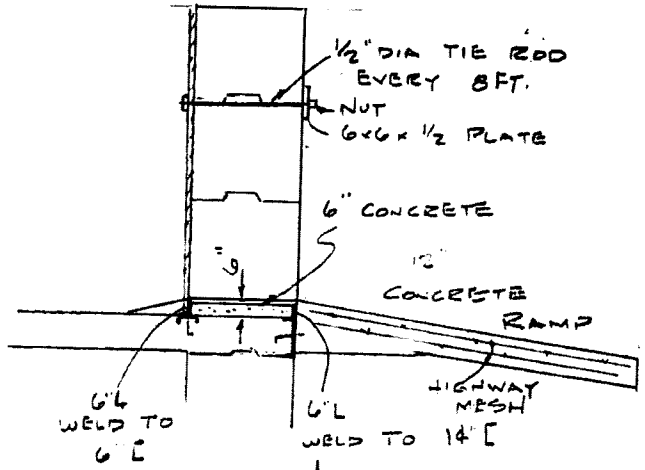
Bill Osborn / ABC Coke
Environmental Coordinator
205.849.1338
bosborn@abccoke.com



SECTION A-A



SECTION B-B

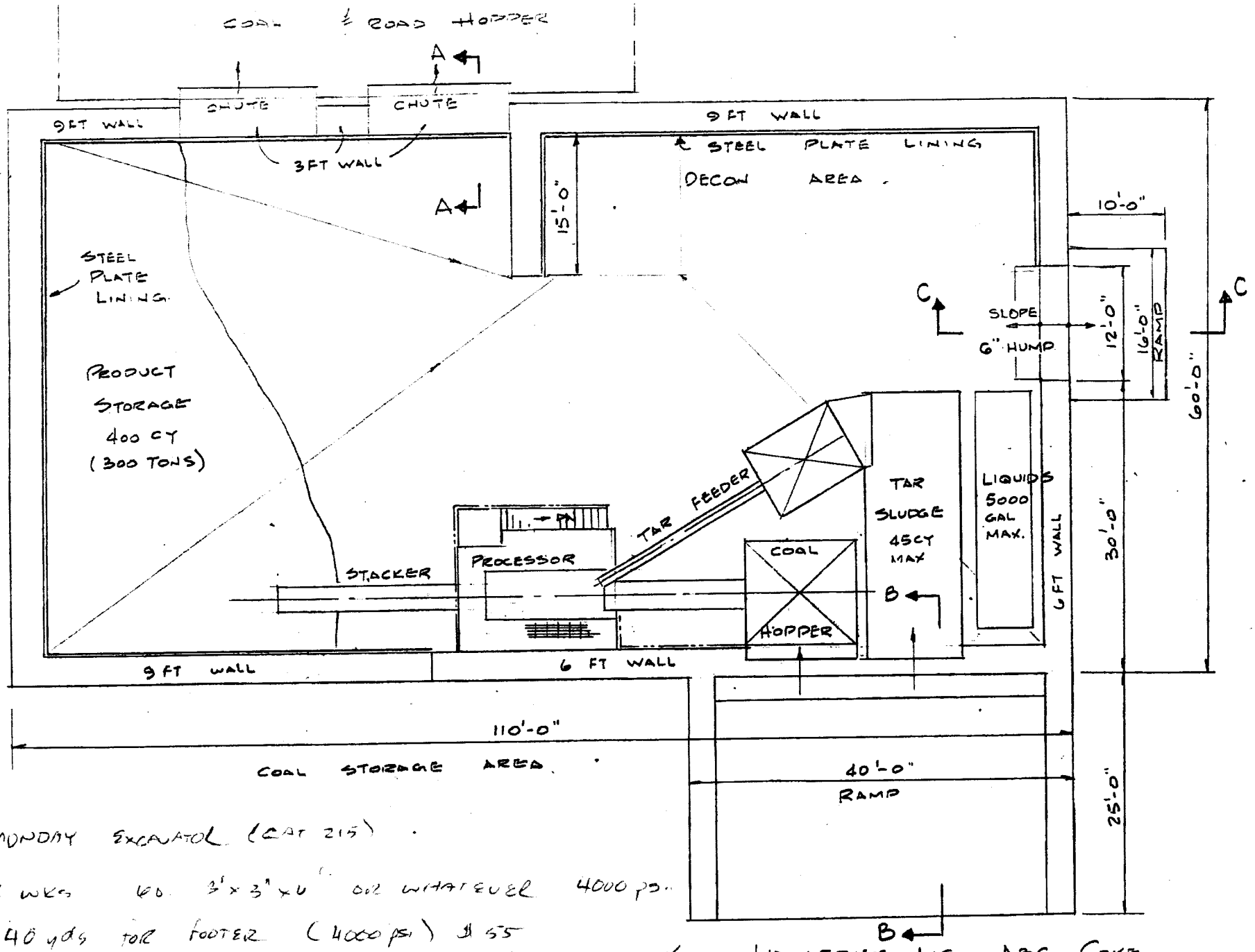


SECTION C-C

KIPIN INDUSTRIES.

RECYCLE CE

1/4 = 1'-0



MONDAY EXCAVATOL (CAT 215)

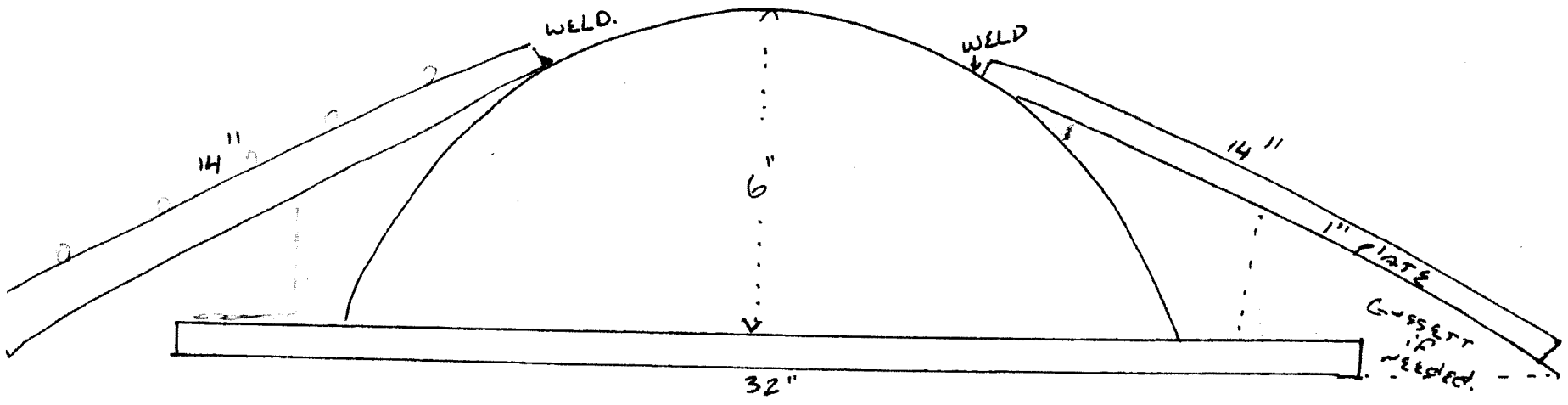
2 WKS 60 3'x3'x4' OR WHATEVER 4000 psi

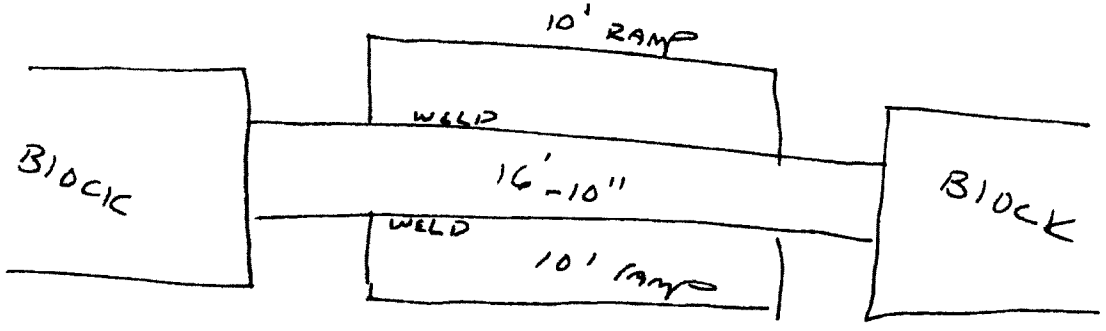
40 yds FOR FOOTER (4000 psi) @ 55

WILL CALL

KIPIN INDUSTRIES, INC - ABC COKE
RECYCLE CENTER

1"=1'-0"

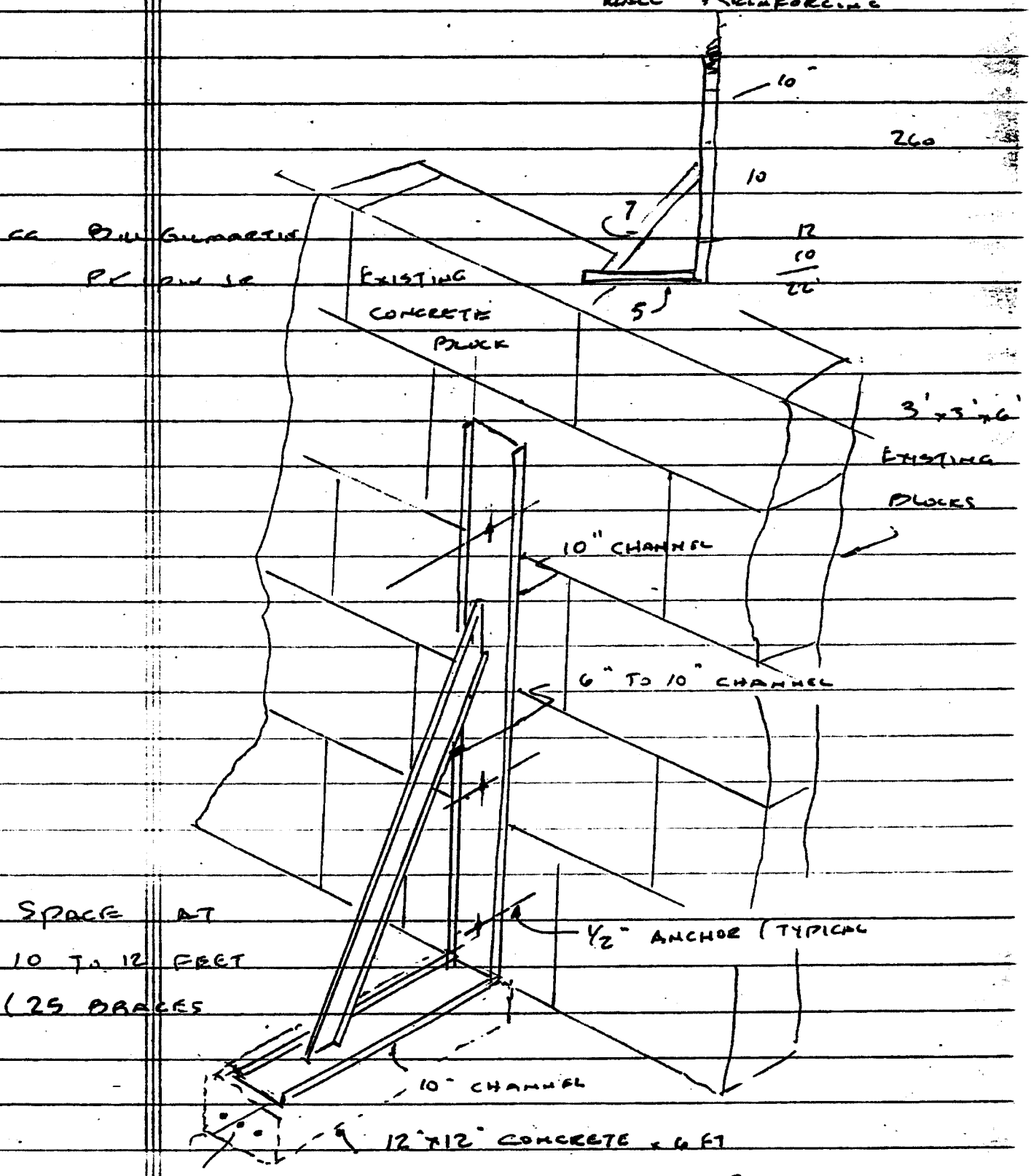

WELD.
WELD
14"
14"
6"
1" PLATE
GUSSETT
IF
NEEDED.
32"


10' RAMP
WELD
BLOCK
16'-10"
BLOCK
WELD
10' RAMP

KIPIN INDUSTRIES, INC

RECYCLE CENTRE

WALL REINFORCING



SPACE AT

10 TO 12 FEET

(25 BRACES

WALL REINFORCMENT

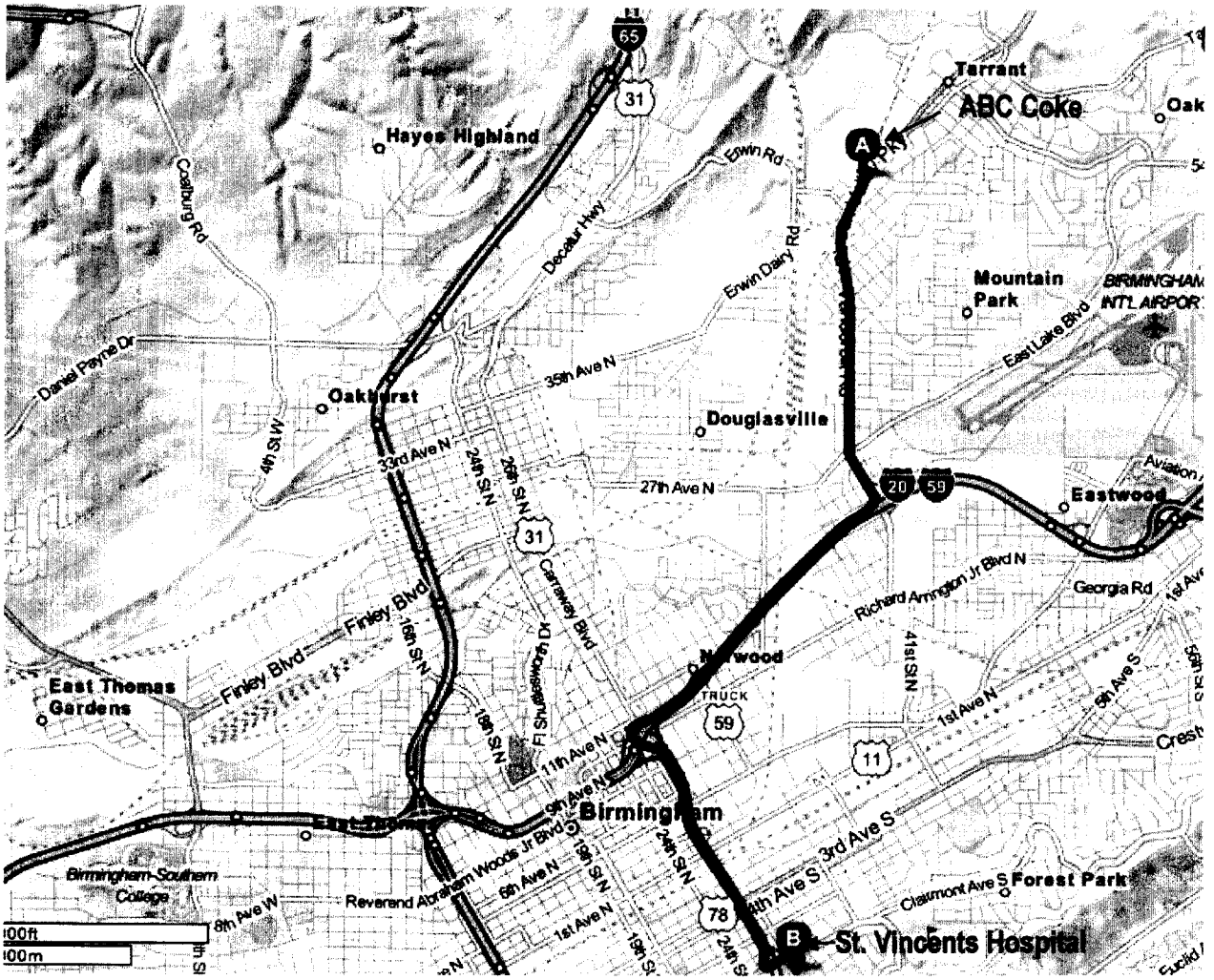
AT CITIZENS GAS.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
CLEAN WATER ENFORCEMENT BRANCH
INSPECTION PLAN

Facility:	The Drummond Company Inc. – A division of ABC Coke
Permit #	AL0003417
Dates:	August 13-17, 2012

I	**Objective**
	The purpose of this inspection is to evaluate the Facility=s compliance with the NPDES permit conditions. The Drummond Company Inc. is authorized to discharge treated process wastewater and stormwater run-off from coke making operations as a major facility under the NPDES permit.
II	**Tasks**
	$ Interview staff on NPDES permit compliance, follow checklist and follow up questions $ Review NPDES records, permit, DMRs, Lab Reports $ Visit process areas from wastewater generation to discharge $ Visit wastewater treatment plants, review logs, review sampling procedures, flow measuring, follow checklist $ Walk the premises to account for all permitted outfalls and other discharges
III	**Procedures**
	$ Entry and Presentation of Credentials $ Opening Conference $ Interviews $ Visit selected sites $ Walk thru of wastewater production and treatment areas $ Check all outdoor exposed material storage and processing areas $ Check wastewater sludge storage areas if applicable $ Evaluate premises and quantity of outfalls $ Check lab procedures, sampling procedures, flow $ Visually observe outfall discharge $ Closing Conference $ Inspection Report
IV	**Resources**
	$ Staff knowledgeable of NPDES permit $ Operator of wastewater treatment plants $ Staff knowledgeable with wastewater generation, Operation & Maintenance and process control of treatment units
V	**Schedule**
	$ Inspection visit will be conducted in approximately four days, Monday, August 13, 2012, through Friday, August 17, 2012, from 8:00 am to approximately 5:30 pm $ See Inspection Agenda for details
VI	**Equipment Needed**

	$ Digital camera $ GPS Unit $ Four (4) double A batteries $ Steel toe boots $ Safety glasses and hearing protection $ Inspection log book $ Mask for fugitive dusts $ Facility Inspection File, Permit, Diagrams $ Inspection questions checklist
VII	**Contact Information**
	Alabama Department of Environmental Management $ Eric Sanderson- ADEM Water Division, Industrial Section – (334) 271-7838 *The Drummond Company Inc. – A division of ABC Coke* $ W. Mark Poling, Manger of Engineering and Environment (205) 849-1342 *EPA Region 4* Maurice Horsey, Municipal & Industrial Enforcement Chief, WPD EPA Region 4 404-562-9764 Judy Marshall, Water Legal Support Section EPA Region 4 404-562-9533
VIII	**Emergency Information**
	St. Vincents Hospital 810 St. Vincents Drive Birmingham, Alabama 35205 (5.28 miles away) Main Phone: **(205) 939-7000** <u>Driving Directions</u> **From ABC Coke → 910 Pinson Valley Parkway, Tarrant, AL 35217** 1. Start out going South on Pinson Valley Pkwy/AL-79 toward Alabama St. Continue to follow AL-79 S. (1.7 miles) 2. Stay **straight** to go onto Tallapoosa St. (0.3 miles) 3. Merge onto **I-20 W/I-59 S.** (1.8 miles) 4. Merge onto **US-31 S/US-280 E/Elton B Stephens Expy/AL-3 S** via **Exit** 126A. (1.7 miles) 5. Take the exit toward **8th Ave S.** (0.2 miles) 6. Turn **left** onto **AL-149/University** Blvd. Continue to follow **University Blvd.** (0.2 miles) 7. Turn **right** onto **St. Vincents Dr.** (0.1 miles) End at 810 SAINT VINCENTS DR., Birmingham, Alabama 35205 (If you reach 10th AVE S. you've gone about 0.2 miles too far.) Total Estimated Time: 10 minutes Total Distance: 6.04 miles


Tarrant
ABC Coke
Hayes Highland
Coalburg Rd
Decatur Hwy
Erwin Rd
Erwin Dairy Rd
Mountain Park
East Lake Blvd
Daniel Payne Dr
Oakhurst
35th Ave N
Douglasville
4th St W
33rd Ave N
24th St N
26th St N
27th Ave N
Eastwood
Aviation
Richard Arrington Jr Blvd N
Georgia Rd
Finley Blvd
16th St N
Carraway Blvd
Ft Shuttlesworth Dr
Norwood
41st St N
East Thomas Gardens
TRUCK
1st Ave N
11th Ave N
9th Ave N
Birmingham
3rd Ave S
6th Ave N
Birmingham-Southern College
8th Ave W
Reverand Abraham Woods Jr Blvd
Claimont Ave S
Forest Park
St. Vincents Hospital
00ft
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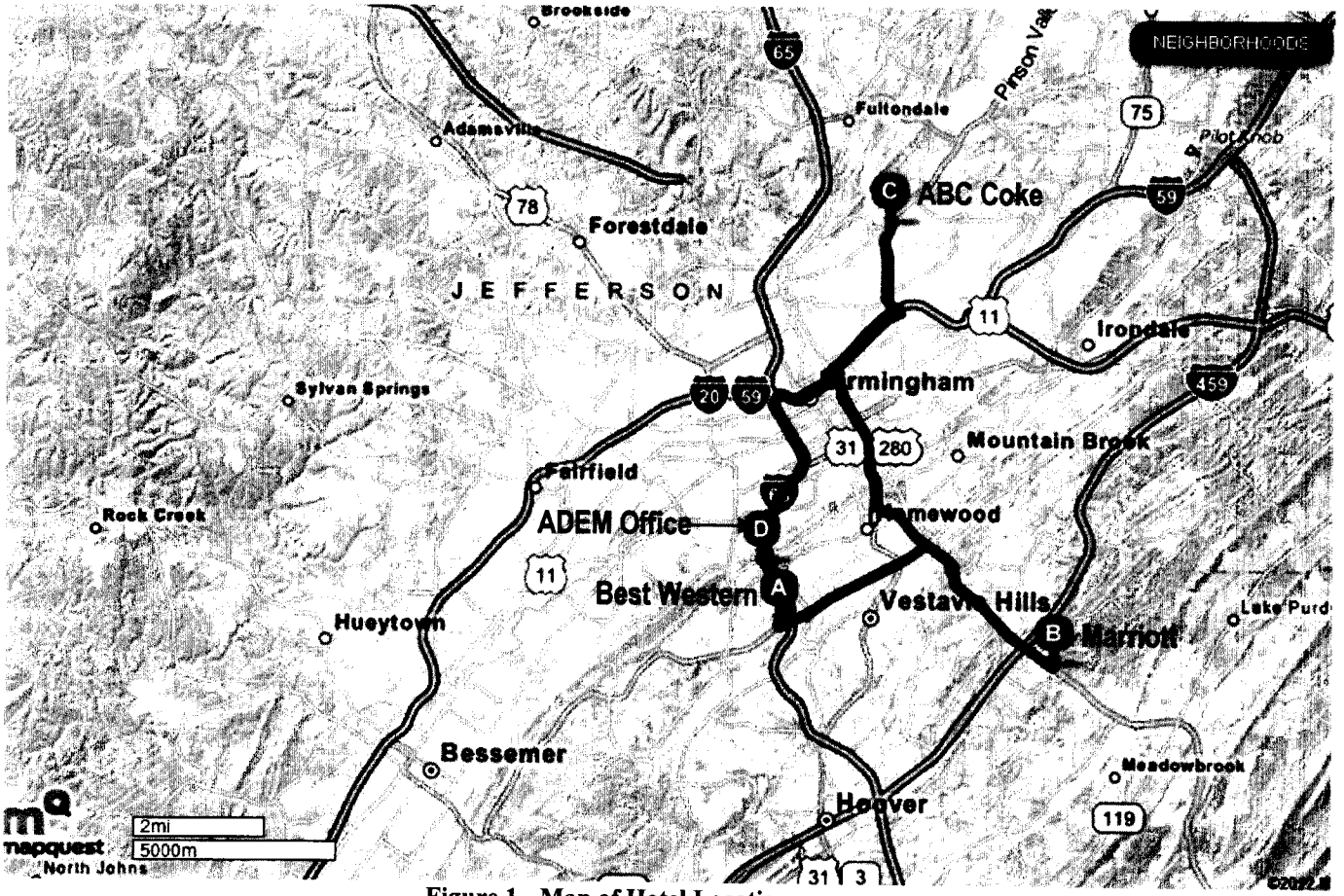


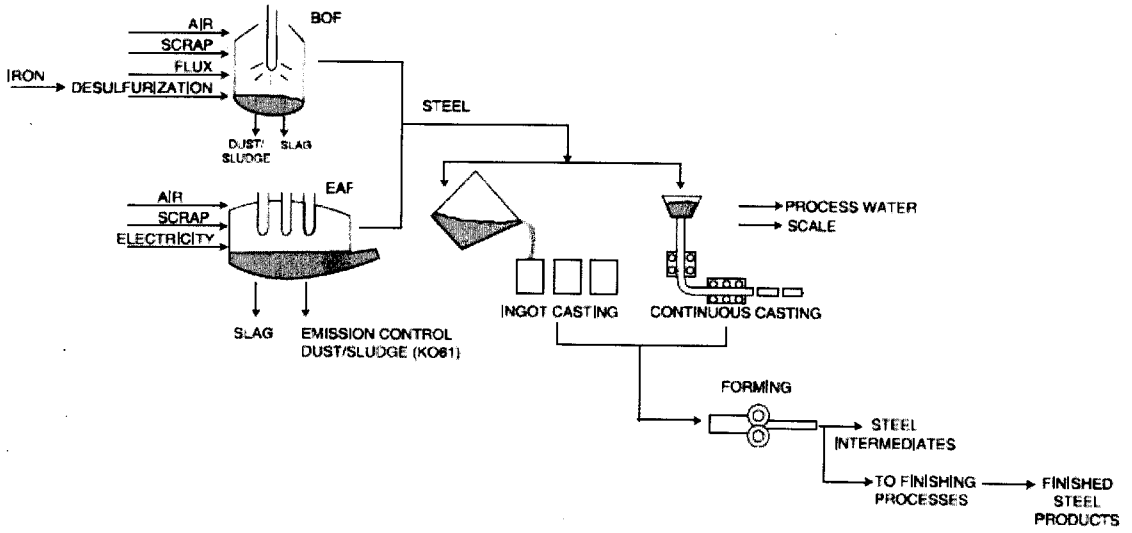
Figure 1 - Map of Hotel Locations

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4 CLEAN WATER ENFORCEMENT BRANCH
INSPECTION AGENDA

Facility:	The Drummond Company Inc. – A division of ABC Coke
Permit #	AL0003417
Dates:	August 13-17, 2012

Day	Item	Comments
1	Opening Conference	$ Introduction and presentation of credentials $ Discuss objectives of inspection $ Arrangement for availability and copying of documents $ Discussion of safety issues $ Discussion about photographs $ Discussion of inspection schedule and sites to visit $ Description of personnel and/or escorts needed
1	Discussion of Operations	$ Discuss site operations $ Discuss wastewater generation $ Discuss wastewater treatment and discharge $ Discuss outdoor material storage areas and other exposed processing areas in the purview of the NPDES Stormwater regulations
1-4	Review Records	$ Review NPDES permits available on site $ Review DMRs $ Review records used to create DMRs $ Review lab records $ Review Effluent Toxicity Testing and Biomonitoring data $ Review Best Management Practices Plan $ Review Spill Prevention Control and Countermeasure Plan $ Request copy of Facility diagram showing storm water drainage areas, direction of stormwater flow, location of stormwater outfalls and structures/mechanisms intended to prevent storm water pollution $ Review BMP daily inspection checklist $ Review weekly WWTP and Stormwater inspection logs $ Review Solvent Management Plan $ Review Stream Monitoring results
4	Visit Process Areas, Lab, premises, wastewater treatment plant and outfalls	$ Visit process areas $ Visit Lab $ Visit wastewater treatment plant $ Visit raw material storage areas $ Evaluate Flow Measuring device $ Walk premises and visit/evaluate outfalls/receiving waters $ Evaluate sampling location and procedures
	Closing Conference	$ Discuss general findings

Iron and Steel Manufacturing
Steelmaking



BOF – Basic Oxygen Furnace is preceded by coke making and iron making operations. BOF is typically for high tonnage carbon steels.

EAF – Electric Arc Furnaces are used to melt scrap and other materials.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4 CLEAN WATER ENFORCEMENT BRANCH
ATTENDANCE SHEET

Facility:	The Drummond Company Inc. – A division of ABC Coke
Permit #	AL0003417
Dates:	August 13-17, 2012

Name	Title	Company	Phone Number

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4 CLEAN WATER ENFORCEMENT BRANCH
ATTENDANCE SHEET

Facility:	The Drummond Company Inc. – A division of ABC Coke
Permit #	AL0003417
Dates:	August 13-17, 2012

Name	Title	Company	Phone Number

The Drummond Company Inc.
ABC Coke Division Company
Birmingham, Alabama
DOCUMENT REQUEST

GENERAL PROCEDURE

During the focused compliance evaluation inspection at the Drummond Company Inc., EPA inspectors will be reviewing records kept for your facility. In order to expedite this portion of the inspection, EPA is providing you advanced notification of the records that will likely be reviewed onsite. For most documents, EPA will review the records onsite and request copies, as needed. In certain cases, document copies will be requested for later review offsite by EPA.

In preparation for this compliance evaluation inspection, EPA has divided this record and document request into two portions. The first section consists of documents that EPA would like available and copies prepared (as noted) on August 13, 2012. The second section consists of general documentation that will be reviewed by EPA inspectors. Other documents may also be requested that are not listed. During the inspection, EPA will work with the Drummond Company Inc., to develop a schedule to review these documents.

If confidentiality is asserted for any response or document provided pursuant to this request, please ensure that each response or document is marked "Confidential" in a color clearly discernible from the print in the response or document.

PART 1 - Please have these documents available on August 13, 2012:

1. Written description of all process areas including the following information (2 Copies):

    a. Wastewater process flow diagrams
    b. Water balance diagram
    c. Raw materials used and annual usage
    d. Products made

2. Site Map of the facility (2 Copies)

3. Management organization chart (including environmental department). (1 Copy)

4. Current NPDES Permit AL0003417 and any applicable modifications.

5. Solvent Management Plan (1 Copy)

6. Best Management Practices Plan (1 Copy)

7. Spill Prevention Control and Countermeasure Plan (1 Copy)

PART 2 - Documents likely to be requested by EPA inspectors (Schedule to be determined)
General

1. List of all laboratories (onsite and offsite) used and types of analyses conducted.

2. Chain of custody records for parameters analyzed under NPDES Permit AL0003417.

3. Discharge Monitoring Reports. (last 3 years)

4. Consent Decrees/Orders/Agreements and related correspondences relevant to NPDES Permit AL0003417.

5. Listing of all process equipment shutdowns, including starting and ending dates/times for the last 5 years.

6. Documentation of any wastewater analytical results generated at the facility, including toxicity testing and stream monitoring results. (last 3 years)

7. Inspection schedules logs/summaries for all c ontainer storage areas, areas evaluated in BMP, and WWTP. (last 3 years).

8. Enforcement Actions/Notices of Violations (NOVs) relevant to NPDES Permit AL0003417.

9. For each of the wastewater treatment process s:
   - Description of design criteria
   - Description of manufacturer's o eration and maintenance requirement(s)

10. Documentation of any notifications sent to the Alabama Department of Environmental Management reporting a bypass or upset of wastewater treatment (last 3 years).

DMR Summary

*** Region 4 Certified ***

1/1/2010 to 12/31/2012

Permit AL0003417

Permit Name	Version Nmbr	Curr. Major Minor Status	Issue Date	Effective Date	Expiration Date
ABC COKE DIV DRUMMOND CO INC	0	Major	3/3/09	4/1/09	3/31/14

Version # 0

Outfall 0011

00300 Oxygen, dissolved (DO) / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/09	3/31/14	GRAB	Weekly

Limit Unit Desc	Milligrams per Liter
Statistical Base	DAILY MN
Limit Value	6
1/31/10	9.8
2/28/10	9.1
3/31/10	9.2
4/30/10	8.2
5/31/10	7.6
6/30/10	6.4
7/31/10	7.2
8/31/10	6.9
9/30/10	8.1
10/31/10	8.7
11/30/10	7.6
12/31/10	6.9
1/31/11	7
2/28/11	6.6
3/31/11	6.1
4/30/11	6.9
5/31/11	6
6/30/11	6.5
7/31/11	6.4
8/31/11	6.7
9/30/11	6
10/31/11	6.9
11/30/11	8.3
12/31/11	8.4
1/31/12	8.2
2/29/12	8.3
3/31/12	6.8
4/30/12	6.7
5/31/12	7.3
6/30/12	7.6
7/31/12	6.6
8/31/12	7
9/30/12	6
10/31/12	6.6
11/30/12	8.3
12/31/12	8.9

DMR Summary

*** Region 4 Certified ***

1/1/2010 to 12/31/2012

Permit AL0003417

Version # 0

Outfall 0011

00400 pH / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/09	3/31/14	GRAB	Daily

Limit Unit Desc	Standard Units	Standard Units
Statistical Base	DAILY MN	DAILY MX
Limit Value	6	9
1/31/10	6.8	7.9
2/28/10	7.2	7.8
3/31/10	6.8	7.8
4/30/10	6.5	7.7
5/31/10	7.3	7.8
6/30/10	7	7.8
7/31/10	6.8	7.7
8/31/10	6.2	7.5
9/30/10	7	7.7
10/31/10	7	7.8
11/30/10	7	7.5
12/31/10	6.6	7.6
1/31/11	6	7.5
2/28/11	6.3	7.7
3/31/11	7.1	7.6
4/30/11	7	7.6
5/31/11	7.2	7.7
6/30/11	6.9	7.7
7/31/11	6.8	7.8
8/31/11	7	7.6
9/30/11	6.8	7.6
10/31/11	6.8	7.5
11/30/11	6.7	7.3
12/31/11	6.7	7.4
1/31/12	6.7	7.6
2/29/12	6.9	7.4
3/31/12	6.9	7.6
4/30/12	6.8	7.3
5/31/12	6.7	7.2
6/30/12	6.8	7.4
7/31/12	6.6	7.4
8/31/12	6.8	7.4
9/30/12	6.6	7.4
10/31/12	7	7.6
11/30/12	7.1	7.6
12/31/12	7	7.5

00530 Solids, total suspended / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/09	3/31/14	COMPOS	Weekly

DMR Summary

*** Region 4 Certified ***

1/1/2010 to 12/31/2012

Permit AL0003417

Version # 0

Outfall 0011

00530 Solids, total suspended / Location 1 / Season 0 / Base

Limit Unit Desc	Pounds per Day	Pounds per Day
Statistical Base	MO AVG	DAILY MX
Limit Value	342	513
1/31/10	4.8	6
2/28/10	2.3	3
3/31/10	5.4	13
4/30/10	3.3	6
5/31/10	3.5	6
6/30/10	7.8	26
7/31/10	3.5	6
8/31/10	4.8	8
9/30/10	4.2	8
10/31/10	4.3	8
11/30/10	6	11
12/31/10	14.4	24
1/31/11	35	53
2/28/11	18.8	39
3/31/11	9.4	20
4/30/11	4.5	6
5/31/11	4	9
6/30/11	4.2	9
7/31/11	7.5	11
8/31/11	6.2	11
9/30/11	9.8	18
10/31/11	10.3	13
11/30/11	9.2	12
12/31/11	19	36
1/31/12	19.5	28
2/29/12	11.2	23
3/31/12	10.3	17
4/30/12	11.3	16
5/31/12	7.6	10
6/30/12	6.3	11
7/31/12	7.5	16
8/31/12	9.4	14
9/30/12	5.8	9
10/31/12	7.4	13
11/30/12	11.5	16
12/31/12	8	12

00625 Nitrogen, Kjeldahl, total (as N) / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/09	3/31/14	COMPOS	Weekly

Limit Unit Desc	Pounds per Day	Pounds per Day
Statistical Base	MO AVG	DAILY MX
Limit Value	66	99

DMR Summary

*** Region 4 Certified ***

1/1/2010 to 12/31/2012

Permit AL0003417

Version # 0

Outfall 0011

00625 Nitrogen, Kjeldahl, total (as N) / Location 1 / Season 0 / Base

5/31/10	6	8.4
6/30/10	8.6	13
7/31/10	6.9	9.2
8/31/10	6.5	7.8
9/30/10	16	53
10/31/10	7.5	9
11/30/10	9.5	11
5/31/11	8.8	10
6/30/11	9.6	11.5
7/31/11	11.5	14.1
8/31/11	9	12.5
9/30/11	9	10
10/31/11	10.3	11
11/30/11	8.6	10
5/31/12	15	24
6/30/12	7.3	9.1
7/31/12	9	10
8/31/12	8.6	11
9/30/12	7.8	8
10/31/12	7.8	8.9
11/30/12	8.8	10

00625 Nitrogen, Kjeldahl, total (as N) / Location 1 / Season 1 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/09	3/31/14	COMPOS	Weekly

Limit Unit Desc	Pounds per Day	Pounds per Day
Statistical Base	MO AVG	DAILY MX
Limit Value	232	348
1/31/10	3.5	4.9
2/28/10	2.8	5
3/31/10	2.8	7
4/30/10	6.8	9.2
12/31/10	14	31
1/31/11	15.8	31
2/28/11	10.5	13
3/31/11	10.8	11
4/30/11	8.8	10
12/31/11	9.3	10
1/31/12	10	12
2/29/12	8.8	10
3/31/12	8.7	10.2
4/30/12	9.5	10.4
12/31/12	8.7	11.1

00720 Cyanide, total (as CN) / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis

DMR Summary

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00720 Cyanide, total (as CN) / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/09	3/31/14	GRAB	Twice Per Month

Limit Unit Desc	Pounds per Day	Pounds per Day
Statistical Base	MO AVG	DAILY MX
Limit Value	18.27	26.11
1/31/10	3.07	3.16
2/28/10	3.84	3.94
3/31/10	3.24	3.34
4/30/10	2.2	3.5
5/31/10	2.98	3.1
6/30/10	2.05	3.2
7/31/10	4.21	8.1
8/31/10	1.4	1.8
9/30/10	2.26	2.45
10/31/10	2	2
11/30/10	2.95	3.6
12/31/10	1.99	2.08
1/31/11	3.79	5.41
2/28/11	2.2	3.4
3/31/11	1.9	2.3
4/30/11	.6	.7
5/31/11	.95	1.1
6/30/11	.8	.8
7/31/11	1.4	2.2
8/31/11	1.35	1.6
9/30/11	1.77	2.6
10/31/11	1.9	2.2
11/30/11	5	6
12/31/11	4.4	5.8
1/31/12	1.5	2
2/29/12	5.2	6.8
3/31/12	1.8	2.3
4/30/12	2	2.2
5/31/12	1.5	2.5
6/30/12	.88	1.17
7/31/12	.73	.95
8/31/12	2.01	2.56
9/30/12	2.4	3
10/31/12	3.55	4.2
11/30/12	5.5	7.7
12/31/12	5.4	7

01045 Iron, total (as Fe) / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/09	3/31/14	COMPOS	Monthly

DMR Summary

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01045 Iron, total (as Fe) / Location 1 / Season 0 / Base

Limit		
Limit Unit Desc	Pounds per Day	Pounds per Day
Statistical Base	MO AVG	DAILY MX
Limit Value	7.5	15
DMR Value		
1/31/10	1.9	1.9
2/28/10	1.3	1.3
3/31/10	1.2	1.2
4/30/10	1.4	1.4
5/31/10	1.3	1.3
6/30/10	1.7	1.7
7/31/10	1.7	1.7
8/31/10	0	0
9/30/10	1.5	1.5
10/31/10	.5	.5
11/30/10	.5	.5
12/31/10	1.9	1.9
1/31/11	4.3	4.3
2/28/11	5.8	5.8
3/31/11	1.6	1.6
4/30/11	1.1	1.1
5/31/11	.7	.7
6/30/11	1.5	1.5
7/31/11	.8	.8
8/31/11	1.6	1.6
9/30/11	2.9	2.9
10/31/11	3.5	3.5
11/30/11	2.7	2.7
12/31/11	3.7	3.7
1/31/12	3.9	3.9
2/29/12	1.8	1.8
3/31/12	3.1	3.1
4/30/12	2.7	2.7
5/31/12	2.9	2.9
6/30/12	2	2
7/31/12	.9	.9
8/31/12	2.2	2.2
9/30/12	1.7	1.7
10/31/12	1.4	1.4
11/30/12	3.5	3.5
12/31/12	4.1	4.1

01055 Manganese, total (as Mn) / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/09	3/31/14	COMPOS	Monthly

Limit		
Limit Unit Desc	Pounds per Day	Pounds per Day
Statistical Base	MO AVG	DAILY MX
Limit Value	5	10

DMR Summary

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Outfall 0011

01055 Manganese, total (as Mn) / Location 1 / Season 0 / Base

1/31/10	0	0
2/28/10	0	0
3/31/10	.1	.1
4/30/10	.1	.1
5/31/10	.15	.15
6/30/10	.1	.1
7/31/10	.1	.1
8/31/10	.74	.74
9/30/10	.1	.1
10/31/10	.3	.3
11/30/10	.3	.3
12/31/10	.13	.13
1/31/11	.3	.3
2/28/11	.2	.2
3/31/11	.3	.3
4/30/11	.3	.3
5/31/11	.19	.19
6/30/11	.3	.3
7/31/11	.4	.4
8/31/11	.16	.16
9/30/11	.1	.1
10/31/11	.2	.2
11/30/11	.2	.2
12/31/11	.2	.2
1/31/12	.2	.2
2/29/12	.4	.4
3/31/12	.2	.2
4/30/12	.2	.2
5/31/12	.2	.2
6/30/12	.1	.1
7/31/12	.2	.2
8/31/12	.2	.2
9/30/12	.2	.2
10/31/12	.2	.2
11/30/12	.2	.2
12/31/12	.2	.2

03582 Oil and grease / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/09	3/31/14	GRAB	Twice Per Month

Limit Unit Desc	Pounds per Day	Pounds per Day
Statistical Base	MO AVG	DAILY MX
Limit Value	25	37.5
1/31/10	0	0
2/28/10	0	0
3/31/10	0	0
4/30/10	0	0

DMR Summary

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Outfall 0011

03582 Oil and grease / Location 1 / Season 0 / Base

5/31/10	0	0
6/30/10	0	0
7/31/10	0	0
8/31/10	0	0
9/30/10	0	0
10/31/10	0	0
11/30/10	0	0
12/31/10	0	0
1/31/11	0	0
2/28/11	0	0
3/31/11	0	0
4/30/11	0	0
5/31/11	0	0
6/30/11	0	0
7/31/11	0	0
8/31/11	0	0
9/30/11	0	0
10/31/11	0	0
11/30/11	0	0
12/31/11	0	0
1/31/12	0	0
2/29/12	NODI=B	NODI=B
3/31/12	NODI=B	NODI=B
4/30/12	NODI=B	NODI=B
5/31/12	NODI=B	NODI=B
6/30/12	NODI=B	NODI=B
7/31/12	NODI=B	NODI=B
8/31/12	NODI=B	NODI=B
9/30/12	NODI=B	NODI=B
10/31/12	NODI=B	NODI=B
11/30/12	NODI=B	NODI=B
12/31/12	NODI=B	NODI=B

34247 Benzo(a)pyrene / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/09	3/31/14	COMPOS	Weekly

Limit		
Limit Unit Desc	Pounds per Day	Pounds per Day
Statistical Base	MO AVG	DAILY MX
Limit Value	.0012	.0024
1/31/10	0	0
2/28/10	0	0
3/31/10	0	0
4/30/10	0	0
5/31/10	0	0
6/30/10	0	0
7/31/10	0	0
8/31/10	0	0

DMR Summary

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Outfall 0011

34247 Benzo(a)pyrene / Location 1 / Season 0 / Base

9/30/10	0	0
10/31/10	0	0
11/30/10	0	0
12/31/10	0	0
1/31/11	0	0
2/28/11	0	0
3/31/11	0	0
4/30/11	0	0
5/31/11	0	0
6/30/11	0	0
7/31/11	0	0
8/31/11	0	0
9/30/11	0	0
10/31/11	0	0
11/30/11	0	0
12/31/11	0	0
1/31/12	0	0
2/29/12	NODI=B	NODI=B
3/31/12	NODI=B	NODI=B
4/30/12	NODI=B	NODI=B
5/31/12	NODI=B	NODI=B
6/30/12	NODI=B	NODI=B
7/31/12	NODI=B	NODI=B
8/31/12	NODI=B	NODI=B
9/30/12	NODI=B	NODI=B
10/31/12	NODI=B	NODI=B
11/30/12	NODI=B	NODI=B
12/31/12	NODI=B	NODI=B

34696 Naphthalene / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/09	3/31/14	GRAB	Monthly

Limit Unit Desc	Pounds per Day	Pounds per Day
Statistical Base	MO AVG	DAILY MX
Limit Value	.15	.15
1/31/10	0	0
2/28/10	0	0
3/31/10	0	0
4/30/10	0	0
5/31/10	0	0
6/30/10	0	0
7/31/10	0	0
8/31/10	0	0
9/30/10	0	0
10/31/10	0	0
11/30/10	0	0
12/31/10	0	0

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34696 Naphthalene / Location 1 / Season 0 / Base

1/31/11	0	0
2/28/11	0	0
3/31/11	0	0
4/30/11	0	0
5/31/11	0	0
6/30/11	0	0
7/31/11	0	0
8/31/11	0	0
9/30/11	0	0
10/31/11	0	0
11/30/11	0	0
12/31/11	0	0
1/31/12	0	0
2/29/12	NODI=B	NODI=B
3/31/12	NODI=B	NODI=B
4/30/12	NODI=B	NODI=B
5/31/12	NODI=B	NODI=B
6/30/12	NODI=B	NODI=B
7/31/12	NODI=B	NODI=B
8/31/12	NODI=B	NODI=B
9/30/12	NODI=B	NODI=B
10/31/12	NODI=B	NODI=B
11/30/12	NODI=B	NODI=B
12/31/12	NODI=B	NODI=B

46000 Phenols / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/09	3/31/14	GRAB	Twice Per Month

Limit Unit Desc	Pounds per Day	Pounds per Day
Statistical Base	MO AVG	DAILY MX
Limit Value	.17	.3
1/31/10	0	0
2/28/10	.005	.01
3/31/10	.01	.01
4/30/10	.01	.02
5/31/10	.01	.01
6/30/10	.015	.02
7/31/10	0	0
8/31/10	.01	.01
9/30/10	.01	.01
10/31/10	.005	.01
11/30/10	.005	.01
12/31/10	.01	.02
1/31/11	.01	.01
2/28/11	.015	.02
3/31/11	.025	.03
4/30/11	.005	.01

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Outfall 0011

46000 Phenols / Location 1 / Season 0 / Base

5/31/11	0	0
6/30/11	.005	.01
7/31/11	.005	.01
8/31/11	.009	.016
9/30/11	.005	.01
10/31/11	.01	.01
11/30/11	0	0
12/31/11	.005	.01
1/31/12	.002	.003
2/29/12	.0025	.005
3/31/12	.001	.002
4/30/12	0	0
5/31/12	.015	.02
6/30/12	.01	.01
7/31/12	.01	.01
8/31/12	.02	.02
9/30/12	.03	.04
10/31/12	.005	.01
11/30/12	.01	.02
12/31/12	.015	.02

50050 Flow, in conduit or thru treatment plant / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/09	3/31/14	TOTALZ	Daily

Limit Unit Desc	Million Gallons per Day	Million Gallons per Day
Statistical Base	MO AVG	DAILY MX
Limit Value	Req. Mon.	Req. Mon.
1/31/10	.30122	.40563
2/28/10	.29065	.38891
3/31/10	.31855	.41137
4/30/10	.34737	.44444
5/31/10	.36361	.4418
6/30/10	.37599	.43944
7/31/10	.36355	.43175
8/31/10	.36412	.44914
9/30/10	.35206	.40766
10/31/10	.34453	.43183
11/30/10	.36264	.41728
12/31/10	.35744	.43203
1/31/11	.36307	.45129
2/28/11	.37486	.43918
3/31/11	.39971	.46954
4/30/11	.35744	.47178
5/31/11	.37793	.42777
6/30/11	.38504	.43358
7/31/11	.39144	.44655

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50050 Flow, in conduit or thru treatment plant / Location 1 / Season 0 / Base

8/31/11	.3774	.42558
9/30/11	.39277	.47028
10/31/11	.38343	.43216
11/30/11	.39646	.47855
12/31/11	.41857	.47154
1/31/12	.40626	.50606
2/29/12	.41896	.44755
3/31/12	.40885	.46859
4/30/12	.40322	.46897
5/31/12	.42364	.48652
6/30/12	.37476	.43597
7/31/12	.37666	.4531
8/31/12	.38451	.44451
9/30/12	.36916	.42595
10/31/12	.35906	.41623
11/30/12	.36823	.40276
12/31/12	.39298	.43828

51173 Cyanide, free available / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/09	3/31/14	GRAB	Twice Per Month

Limit Unit Desc	Pounds per Day	Pounds per Day
Statistical Base	MO AVG	DAILY MX
Limit Value	.145	.475
1/31/10	.02	.023
2/28/10	.046	.048
3/31/10	.043	.05
4/30/10	.08	.09
5/31/10	.101	.106
6/30/10	.05	.07
7/31/10	.087	.11
8/31/10	.047	.047
9/30/10	.05	.054
10/31/10	.06	.06
11/30/10	.035	.04
12/31/10	.046	.053
1/31/11	.041	.041
2/28/11	.05	.07
3/31/11	.06	.07
4/30/11	.08	.09
5/31/11	0	0
6/30/11	.035	.04
7/31/11	.075	.1
8/31/11	.045	.05
9/30/11	.04	.05
10/31/11	.05	.06
11/30/11	.04	.04

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Outfall 0011

51173 Cyanide, free available / Location 1 / Season 0 / Base

12/31/11	.06	.06
1/31/12	.04	.06
2/29/12	.05	.05
3/31/12	.05	.05
4/30/12	.04	.04
5/31/12	.06	.07
6/30/12	.036	.037
7/31/12	.031	.038
8/31/12	.055	.059
9/30/12	.02	.03
10/31/12	.07	.07
11/30/12	.05	.05
12/31/12	.01	.03

61426 Toxicity (chronic), Ceriodaphnia dupia / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/09	3/31/14	GRAB	Monthly

Limit Unit Desc	Pass=0; Fail=1
Statistical Base	DAILY MX
Limit Value	0
1/31/10	0
2/28/10	0
3/31/10	0
4/30/10	0
5/31/10	0
6/30/10	0
7/31/10	0
8/31/10	0
9/30/10	0
10/31/10	0
11/30/10	0
12/31/10	0
1/31/11	0
2/28/11	0
3/31/11	0
4/30/11	0
5/31/11	0
6/30/11	0
7/31/11	0
8/31/11	0
9/30/11	0
10/31/11	0
11/30/11	0
12/31/11	0
1/31/12	0
2/29/12	0
3/31/12	0

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Outfall 0011

61426 Toxicity (chronic), Ceriodaphnia dupia / Location 1 / Season 0 / Base

4/30/12	0
5/31/12	0
6/30/12	0
7/31/12	0
8/31/12	0
9/30/12	0
10/31/12	0
11/30/12	0
12/31/12	0

61428 Toxicity (chronic), Pimephales promelas (Fathead Minnow) / Location 1 / Season 0 / Ba

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/09	3/31/14	GRAB	Monthly

Limit Unit Desc	Pass=0; Fail=1
Statistical Base	DAILY MX
Limit Value	0
1/31/10	0
2/28/10	0
3/31/10	0
4/30/10	0
5/31/10	0
6/30/10	0
7/31/10	0
8/31/10	0
9/30/10	0
10/31/10	0
11/30/10	0
12/31/10	0
1/31/11	0
2/28/11	0
3/31/11	0
4/30/11	0
5/31/11	0
6/30/11	0
7/31/11	0
8/31/11	0
9/30/11	0
10/31/11	0
11/30/11	0
12/31/11	0
1/31/12	0
2/29/12	0
3/31/12	0
4/30/12	0
5/31/12	0
6/30/12	0
7/31/12	0

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Outfall 0011

61428 Toxicity (chronic), Pimephales promelas (Fathead Minnow) / Location 1 / Season 0 / Ba

8/31/12	0
9/30/12	0
10/31/12	0
11/30/12	0
12/31/12	0

61574 Ammonia (as N) + unionized ammonia / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/09	3/31/14	COMPOS	Weekly

Limit Unit Desc	Pounds per Day	Pounds per Day
Statistical Base	MO AVG	DAILY MX
Limit Value	33	49.5
5/31/10	.7	.9
6/30/10	.8	1.6
7/31/10	.9	1.3
8/31/10	1.1	1.4
9/30/10	8.8	40.9
10/31/10	1.1	2.3
11/30/10	.9	1.2
5/31/11	.8	.9
6/30/11	.9	1.1
7/31/11	1.4	1.7
8/31/11	.9	1.2
9/30/11	.9	1.1
10/31/11	1.1	1.3
11/30/11	.9	1.1
5/31/12	5.9	14.3
6/30/12	.8	.9
7/31/12	.8	1
8/31/12	.9	1.1
9/30/12	.9	1
10/31/12	.8	.9
11/30/12	.9	1.2

61574 Ammonia (as N) + unionized ammonia / Location 1 / Season 1 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/09	3/31/14	COMPOS	Weekly

Limit Unit Desc	Pounds per Day	Pounds per Day
Statistical Base	MO AVG	DAILY MX
Limit Value	33.1	52.4
1/31/10	52.6	52.6
2/28/10	.4	.5
3/31/10	.5	.7

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61574 Ammonia (as N) + unionized ammonia / Location 1 / Season 1 / Base

4/30/10	.9	1.4
12/31/10	5.5	23
1/31/11	.7	1
2/28/11	1.7	2.9
3/31/11	1.3	1.7
4/30/11	.5	.8
12/31/11	1.2	1.5
1/31/12	.8	.9
2/29/12	.8	1.1
3/31/12	1.1	1.6
4/30/12	.9	1.2
12/31/12	.7	.8

70295 Solids, total dissolved / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/09	3/31/14	COMPOS	Monthly

Limit Unit Desc	Pounds per Day
Statistical Base	DAILY MX
Limit Value	Req. Mon.
1/31/10	3362
2/28/10	3174
3/31/10	3590
4/30/10	4125
5/31/10	4822
6/30/10	5881
7/31/10	6644
8/31/10	6697
9/30/10	6054
10/31/10	5511
11/30/10	6721
12/31/10	5212
1/31/11	5977
2/28/11	5051
3/31/11	5597
4/30/11	4950
5/31/11	4882
6/30/11	5920
7/31/11	6552
8/31/11	5981.3
9/30/11	5480
10/31/11	6296
11/30/11	5624.3
12/31/11	5522.9
1/31/12	5157.7
2/29/12	5676
3/31/12	6627
4/30/12	6298

DMR Summary

*** Region 4 Certified ***

1/1/2010 to 12/31/2012

Permit AL0003417

Version # 0

Outfall 0011

70295 Solids, total dissolved / Location 1 / Season 0 / Base

5/31/12	6634
6/30/12	5407
7/31/12	5875.4
8/31/12	6143
9/30/12	4324
10/31/12	5332.8
11/30/12	7283
12/31/12	5502

80082 BOD, carbonaceous, 05 day, 20 C / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/09	3/31/14	COMPOS	Weekly

Limit Unit Desc	Pounds per Day	Pounds per Day
Statistical Base	MO AVG	DAILY MX
Limit Value	56	84
5/31/10	5.5	9
6/30/10	7.6	12
7/31/10	5.9	7.5
8/31/10	4.5	6
9/30/10	5.4	10
10/31/10	5.5	6
11/30/10	0	0
5/31/11	6.8	10
6/30/11	7.8	12
7/31/11	5.8	7
8/31/11	6	9
9/30/11	5.3	8
10/31/11	5.8	7
11/30/11	4.4	7
5/31/12	7.2	10
6/30/12	3.8	4.4
7/31/12	4.5	6
8/31/12	4.2	6
9/30/12	3	5
10/31/12	4.6	5
11/30/12	5	6

80082 BOD, carbonaceous, 05 day, 20 C / Location 1 / Season 1 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/09	3/31/14	COMPOS	Weekly

Limit Unit Desc	Pounds per Day	Pounds per Day
Statistical Base	MO AVG	DAILY MX
Limit Value	213	320

DMR Summary

*** Region 4 Certified ***

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Version # 0

Outfall 0011

80082 BOD, carbonaceous, 05 day, 20 C / Location 1 / Season 1 / Base

DMR Value		
1/31/10	3.8	7
2/28/10	3.5	6
3/31/10	3.8	6
4/30/10	5	10
12/31/10	0	0
1/31/11	2.1	8.3
2/28/11	6.3	10
3/31/11	7.2	9
4/30/11	4.3	7
12/31/11	6	9
1/31/12	6.3	9
2/29/12	4.6	7
3/31/12	2.8	6
4/30/12	6.5	8
12/31/12	4.5	5

Outfall 001Q

00630 Nitrite plus nitrate total 1 det. (as N) / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/09	3/31/14	COMPOS	Quarterly

Limit	
Limit Unit Desc	Pounds per Day
Statistical Base	DAILY MX
Limit Value	Req. Mon.
DMR Value	
3/31/10	0
6/30/10	0
9/30/10	35.4
12/31/10	41.7
3/31/11	36.4
6/30/11	28.8
9/30/11	12.6
12/31/11	32.9
3/31/12	19.9
6/30/12	17.2
9/30/12	19.2
12/31/12	26.1

00665 Phosphorus, total (as P) / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/09	3/31/14	COMPOS	Quarterly

Limit	
Limit Unit Desc	Pounds per Day
Statistical Base	DAILY MX
Limit Value	Req. Mon.
DMR Value	
3/31/10	0

DMR Summary

*** Region 4 Certified ***

1/1/2010 to 12/31/2012

Permit AL0003417

Version # 0

Outfall 001Q

00665 Phosphorus, total (as P) / Location 1 / Season 0 / Base

6/30/10	0
9/30/10	.3
12/31/10	0
3/31/11	.3
6/30/11	0
9/30/11	0
12/31/11	.2
3/31/12	.3
6/30/12	NODI=B
9/30/12	NODI=B
12/31/12	NODI=B

Outfall 0021

00400 pH / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/09	3/31/14	GRAB	Weekly

Limit Unit Desc	Standard Units	Standard Units
Statistical Base	DAILY MN	DAILY MX
Limit Value	6	8.5
1/31/10	7.3	8.3
2/28/10	7.32	7.9
3/31/10	7.28	7.75
4/30/10	7.12	7.68
5/31/10	7.1	7.8
6/30/10	7.52	7.88
7/31/10	7.18	7.29
8/31/10	7.4	8.4
9/30/10	7.55	8.18
10/31/10	8.25	8.35
11/30/10	7.3	7.9
12/31/10	7.66	8.42
1/31/11	7.8	8.35
2/28/11	7.42	7.51
3/31/11	7.09	8.35
4/30/11	6.99	7.85
5/31/11	7.6	8.05
6/30/11	6.9	7.75
7/31/11	7.12	7.37
8/31/11	7.5	8.14
9/30/11	7.21	8.32
10/31/11	7.11	8.4
11/30/11	7.19	7.49
12/31/11	6.83	7.3
1/31/12	7.67	7.85
2/29/12	7.68	7.8
3/31/12	7.44	7.84

DMR Summary

*** Region 4 Certified ***

1/1/2010 to 12/31/2012

Permit AL0003417

Version # 0

Outfall 0021

00400 pH / Location 1 / Season 0 / Base

4/30/12	7.29	8.32
5/31/12	8.2	8.41
6/30/12	7.19	8.32
7/31/12	8.05	8.25
8/31/12	6.57	7.5
9/30/12	7.9	8.3
10/31/12	7.28	8.35
11/30/12	7.25	8.16
12/31/12	7.1	7.46

00530 Solids, total suspended / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/09	3/31/14	GRAB	Weekly

Limit Unit Desc	Milligrams per Liter	Milligrams per Liter
Statistical Base	MO AVG	DAILY MX
Limit Value	35	70
DMR Value		
1/31/10	22.3	48
2/28/10	30.3	68
3/31/10	11.6	26
4/30/10	25.5	40
5/31/10	11	17
6/30/10	21	36
7/31/10	5.5	6.5
8/31/10	12.7	14
9/30/10	9	11
10/31/10	6.9	9.5
11/30/10	6.1	12.5
12/31/10	14.1	18
1/31/11	25.5	54
2/28/11	12.5	14
3/31/11	23.3	46
4/30/11	20.3	28
5/31/11	13.5	15
6/30/11	10.5	17
7/31/11	22.5	32
8/31/11	6.5	11
9/30/11	15.5	23
10/31/11	10.5	16
11/30/11	7	14
12/31/11	18.8	40
1/31/12	18.5	35
2/29/12	16	20
3/31/12	16	27
4/30/12	12.5	16
5/31/12	18.3	32
6/30/12	18.3	21

DMR Summary

*** Region 4 Certified ***

1/1/2010 to 12/31/2012

Permit AL0003417

Version # 0

Outfall 0021

00530 Solids, total suspended / Location 1 / Season 0 / Base

7/31/12	15.3	21
8/31/12	23	49
9/30/12	16	26
10/31/12	13.3	18
11/30/12	12.8	22
12/31/12	11.1	13

00720 Cyanide, total (as CN) / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/09	3/31/14	GRAB	Monthly

Limit Unit Desc	Pounds per Day
Statistical Base	DAILY MX
Limit Value	Req. Mon.
1/31/10	0
2/28/10	0
3/31/10	0
4/30/10	0
5/31/10	0
6/30/10	0
7/31/10	0
8/31/10	0
9/30/10	0
10/31/10	0
11/30/10	0
12/31/10	0
1/31/11	0
2/28/11	0
3/31/11	0
4/30/11	0
5/31/11	0
6/30/11	0
7/31/11	0
8/31/11	0
9/30/11	0
10/31/11	0
11/30/11	0
12/31/11	0
1/31/12	0
2/29/12	0
3/31/12	0
4/30/12	0
5/31/12	0
6/30/12	0
7/31/12	0
8/31/12	0
9/30/12	0
10/31/12	0

DMR Summary

***** Region 4 Certified *****

1/1/2010 to 12/31/2012

Permit AL0003417

Version # 0

Outfall 0021

00720 Cyanide, total (as CN) / Location 1 / Season 0 / Base

DMR Value	
11/30/12	0
12/31/12	0

01045 Iron, total (as Fe) / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/09	3/31/14	GRAB	Twice Per Month

Limit		
Limit Unit Desc	Milligrams per Liter	Milligrams per Liter
Statistical Base	MO AVG	DAILY MX
Limit Value	3	6
DMR Value		
1/31/10	1.4	2.21
2/28/10	.69	.9
3/31/10	.615	1.01
4/30/10	1.04	1.54
5/31/10	.47	.78
6/30/10	.8	1.43
7/31/10	.23	.33
8/31/10	.4	.4
9/30/10	.2	.2
10/31/10	.2	.25
11/30/10	.27	.36
12/31/10	.71	.81
1/31/11	1.07	1.51
2/28/11	.73	.73
3/31/11	.71	.721
4/30/11	.682	.813
5/31/11	.43	.53
6/30/11	.74	1.21
7/31/11	.67	.76
8/31/11	.155	.19
9/30/11	.39	.57
10/31/11	.25	.27
11/30/11	.37	.499
12/31/11	1.03	1.16
1/31/12	1.36	2.21
2/29/12	.66	.72
3/31/12	.37	.416
4/30/12	.44	.638
5/31/12	.48	.492
6/30/12	.6	.7
7/31/12	.307	.321
8/31/12	.9	1.6
9/30/12	.35	.52
10/31/12	.37	.502
11/30/12	.21	.32
12/31/12	.44	.56

DMR Summary

*** Region 4 Certified ***

1/1/2010 to 12/31/2012

Permit AL0003417

Version # 0

Outfall 0021

01055 Manganese, total (as Mn) / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/09	3/31/14	GRAB	Twice Per Month

Limit Unit Desc	Milligrams per Liter	Milligrams per Liter
Statistical Base	MO AVG	DAILY MX
Limit Value	2	4
1/31/10	.155	.17
2/28/10	.1	.11
3/31/10	.095	.12
4/30/10	.1	.111
5/31/10	.045	.05
6/30/10	.0517	.0733
7/31/10	.14	.23
8/31/10	.235	.24
9/30/10	.06	.07
10/31/10	.045	.06
11/30/10	.045	.06
12/31/10	.065	.08
1/31/11	.1	.1
2/28/11	.15	.15
3/31/11	.14	.144
4/30/11	.0877	.0989
5/31/11	.21	.23
6/30/11	.31	.42
7/31/11	.34	.38
8/31/11	.365	.38
9/30/11	.14	.222
10/31/11	.09	.09
11/30/11	.21	.302
12/31/11	.22	.26
1/31/12	.12	.117
2/29/12	.13	.13
3/31/12	.32	.536
4/30/12	.53	.684
5/31/12	.18	.244
6/30/12	.3	.4
7/31/12	.314	.346
8/31/12	.2	.21
9/30/12	.12	.14
10/31/12	.3605	.392
11/30/12	.35	.58
12/31/12	.17	.17

03582 Oil and grease / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/09	3/31/14	GRAB	Twice Per Month

DMR Summary

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Version # 0

Outfall 0021

03582 Oil and grease / Location 1 / Season 0 / Base

Limit		
Limit Unit Desc	Milligrams per Liter	Milligrams per Liter
Statistical Base	MO AVG	DAILY MX
Limit Value	10	15
1/31/10	0	0
2/28/10	0	0
3/31/10	0	0
4/30/10	0	0
5/31/10	0	0
6/30/10	0	0
7/31/10	0	0
8/31/10	0	0
9/30/10	0	0
10/31/10	0	0
11/30/10	0	0
12/31/10	0	0
1/31/11	0	0
2/28/11	0	0
3/31/11	0	0
4/30/11	0	0
5/31/11	0	0
6/30/11	0	0
7/31/11	0	0
8/31/11	0	0
9/30/11	0	0
10/31/11	0	0
11/30/11	0	0
12/31/11	0	0
1/31/12	0	0
2/29/12	NODI=B	NODI=B
3/31/12	NODI=B	NODI=B
4/30/12	NODI=B	NODI=B
5/31/12	NODI=B	NODI=B
6/30/12	NODI=B	NODI=B
7/31/12	NODI=B	NODI=B
8/31/12	NODI=B	NODI=B
9/30/12	NODI=B	NODI=B
10/31/12	NODI=B	NODI=B
11/30/12	NODI=B	NODI=B
12/31/12	NODI=B	NODI=B

34030 Benzene / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/09	3/31/14	GRAB	Monthly

DMR Summary

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1/1/2010 to 12/31/2012

Permit AL0003417

Version # 0

Outfall 0021

34030 Benzene / Location 1 / Season 0 / Base

Limit Unit Desc	Pounds per Day
Statistical Base	DAILY MX
Limit Value	Req. Mon.
1/31/10	0
2/28/10	0
3/31/10	0
4/30/10	0
5/31/10	0
6/30/10	0
7/31/10	0
8/31/10	0
9/30/10	0
10/31/10	0
11/30/10	0
12/31/10	0
1/31/11	0
2/28/11	0
3/31/11	0
4/30/11	0
5/31/11	0
6/30/11	0
7/31/11	0
8/31/11	0
9/30/11	0
10/31/11	0
11/30/11	0
12/31/11	0
1/31/12	0
2/29/12	NODI=B
3/31/12	NODI=B
4/30/12	NODI=B
5/31/12	NODI=B
6/30/12	NODI=B
7/31/12	NODI=B
8/31/12	NODI=B
9/30/12	0
10/31/12	NODI=B
11/30/12	NODI=B
12/31/12	NODI=B

34247 Benzo(a)pyrene / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/09	3/31/14	GRAB	Monthly

Limit Unit Desc	Pounds per Day
Statistical Base	DAILY MX
Limit Value	Req. Mon.

DMR Summary

*** Region 4 Certified ***

1/1/2010 to 12/31/2012

Permit AL0003417

Version # 0

Outfall 0021

34247 Benzo(a)pyrene / Location 1 / Season 0 / Base

DMR Value	
1/31/10	0
2/28/10	0
3/31/10	0
4/30/10	0
5/31/10	0
6/30/10	0
7/31/10	0
8/31/10	0
9/30/10	0
10/31/10	0
11/30/10	0
12/31/10	0
1/31/11	0
2/28/11	0
3/31/11	0
4/30/11	0
5/31/11	0
6/30/11	0
7/31/11	0
8/31/11	0
9/30/11	0
10/31/11	0
11/30/11	0
12/31/11	0
1/31/12	0
2/29/12	NODI=B
3/31/12	NODI=B
4/30/12	NODI=B
5/31/12	NODI=B
6/30/12	NODI=B
7/31/12	NODI=B
8/31/12	NODI=B
9/30/12	NODI=B
10/31/12	NODI=B
11/30/12	NODI=B
12/31/12	NODI=B

34696 Naphthalene / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/09	3/31/14	GRAB	Monthly

Limit	
Limit Unit Desc	Pounds per Day
Statistical Base	DAILY MX
Limit Value	Req. Mon.
DMR Value	
1/31/10	0
2/28/10	0
3/31/10	0
4/30/10	0

DMR Summary

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1/1/2010 to 12/31/2012

Permit AL0003417

Version # 0

Outfall 0021

34696 Naphthalene / Location 1 / Season 0 / Base

5/31/10	0
6/30/10	0
7/31/10	0
8/31/10	0
9/30/10	0
10/31/10	0
11/30/10	0
12/31/10	0
1/31/11	0
2/28/11	0
3/31/11	0
4/30/11	0
5/31/11	0
6/30/11	0
7/31/11	0
8/31/11	0
9/30/11	0
10/31/11	0
11/30/11	0
12/31/11	0
1/31/12	0
2/29/12	NODI=B
3/31/12	NODI=B
4/30/12	NODI=B
5/31/12	NODI=B
6/30/12	NODI=B
7/31/12	NODI=B
8/31/12	NODI=B
9/30/12	0
10/31/12	NODI=B
11/30/12	NODI=B
12/31/12	NODI=B

46000 Phenols / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/09	3/31/14	GRAB	Monthly

Limit Unit Desc	Pounds per Day
Statistical Base	DAILY MX
Limit Value	Req. Mon.
1/31/10	0
2/28/10	0
3/31/10	0
4/30/10	0
5/31/10	0
6/30/10	0
7/31/10	0
8/31/10	0

DMR Summary

*** Region 4 Certified ***

1/1/2010 to 12/31/2012

Permit AL0003417

Version # 0

Outfall 0021

46000 Phenols / Location 1 / Season 0 / Base

DMR Value	
9/30/10	0
10/31/10	0
11/30/10	0
12/31/10	0
1/31/11	0
2/28/11	0
3/31/11	0
4/30/11	0
5/31/11	0
6/30/11	0
7/31/11	0
8/31/11	0
9/30/11	0
10/31/11	0
11/30/11	0
12/31/11	0
1/31/12	0
2/29/12	0
3/31/12	0
4/30/12	0
5/31/12	0
6/30/12	0
7/31/12	0
8/31/12	0
9/30/12	0
10/31/12	0
11/30/12	0
12/31/12	0

50050 Flow, in conduit or thru treatment plant / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/09	3/31/14	CALCTD	Daily

Limit		
Limit Unit Desc	Million Gallons per Day	Million Gallons per Day
Statistical Base	MO AVG	DAILY MX
Limit Value	Req. Mon.	Req. Mon.
DMR Value		
1/31/10	.852	.96
2/28/10	.523	.667
3/31/10	.838	1.148
4/30/10	1.23	1.399
5/31/10	.681	.737
6/30/10	.626	.682
7/31/10	1.398	1.777
8/31/10	1.416	1.774
9/30/10	1.474	1.908
10/31/10	1.317	1.399
11/30/10	1.422	1.83

DMR Summary

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1/1/2010 to 12/31/2012

Permit AL0003417

Version # 0

Outfall 0021

50050 Flow, in conduit or thru treatment plant / Location 1 / Season 0 / Base

12/31/10	1.429	1.777
1/31/11	.538	.682
2/28/11	.952	1.126
3/31/11	1.072	1.526
4/30/11	1.247	1.399
5/31/11	1.483	1.937
6/30/11	1.477	2.201
7/31/11	1.776	2.043
8/31/11	1.685	1.83
9/30/11	1.505	1.51
10/31/11	1.6	1.67
11/30/11	1.33	1.937
12/31/11	1.386	1.937
1/31/12	1.436	1.976
2/29/12	.835	1.178
3/31/12	1.418	1.535
4/30/12	1.159	2.846
5/31/12	1.493	1.937
6/30/12	1.64	1.749
7/31/12	2.069	2.201
8/31/12	1.336	1.937
9/30/12	1.209	1.83
10/31/12	1.574	2.113
11/30/12	1.908	2.241
12/31/12	1.129	1.801

61574 Ammonia (as N) + unionized ammonia / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/09	3/31/14	GRAB	Weekly

Limit Unit Desc	Pounds per Day	Pounds per Day
Statistical Base	MO AVG	DAILY MX
Limit Value	Req. Mon.	Req. Mon.
1/31/10	28.4	83.3
2/28/10	7.5	13
3/31/10	4.9	8.14
4/30/10	5.2	7.23
5/31/10	1.95	3.44
6/30/10	2.3	2.56
7/31/10	7.5	7.9
8/31/10	14.5	20.3
9/30/10	8.4	9.8
10/31/10	5.1	8.2
11/30/10	5.6	7.5
12/31/10	9.3	12.5
1/31/11	4.4	6.7
2/28/11	7	7.3
3/31/11	7.5	12.86

DMR Summary

*** Region 4 Certified ***

1/1/2010 to 12/31/2012

Permit AL0003417

Version # 0

Outfall 0021

61574 Ammonia (as N) + unionized ammonia / Location 1 / Season 0 / Base

4/30/11	4.32	4.55
5/31/11	3.55	4.5
6/30/11	23.1	36
7/31/11	11.95	13.3
8/31/11	31.6	48.2
9/30/11	11.4	15.77
10/31/11	3.95	5.9
11/30/11	12.1	15.77
12/31/11	13.6	15.4
1/31/12	11.8	21.78
2/29/12	6.1	6.6
3/31/12	5.3	7.18
4/30/12	80.7	121.5
5/31/12	11.2	19.84
6/30/12	11	17.5
7/31/12	8.35	9.53
8/31/12	10	15.8
9/30/12	4.8	11.1
10/31/12	19.2	42.8
11/30/12	13.8	25
12/31/12	5.38	6.76

NPD	Perr	Vers	DSD	Para	Para	Mon	Mon	Limi	Cha	Lim	Limi	Stat	Lim	Lim	Mon	DMF	DMF	NOD	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	01/3 =		9.8		D90							
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	02/2 =		9.1		D90							
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	03/3 =		9.2									
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	04/3 =		8.2									
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	05/3 =		7.6									
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	06/3 =		6.4									
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	07/3 =		7.2									
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	08/3 =		6.9									
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	09/3 =		8.1									
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	10/3 =		8.7									
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	11/3 =		7.6									
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	12/3 =		6.9									
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	01/3 =		7									
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	02/2 =		6.6									
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	03/3 =		6.1									
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	04/3 =		6.9									
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	05/3 =		6									
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	06/3 =		6.5									
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	07/3 =		6.4									
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	08/3 =		6.7									
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	09/3 =		6									
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	10/3 =		6.9									
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	11/3 =		8.3									
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	12/3 =		8.4									
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	01/3 =		8.2									
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	02/2 =		8.3									
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	03/3 =		6.8									
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	04/3 =		6.7		D90							
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	05/3 =		7.3									
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	06/3 =		7.6									
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	07/3 =		6.6									
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	08/3 =		7									
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	09/3 =		6									
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	10/3 =		6.6									
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	11/3 =		8.3									
AL0	ABC	0	001	003	Oxy	1	Efflu	0	Base	C1	Milli	DAIl	>=	6	12/3 =		8.9									
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	01/3 =		6.8		D90							
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	02/2 =		7.2		D90							
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	03/3 =		6.8									
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	04/3 =		6.5									
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	05/3 =		7.3									
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	06/3 =		7									

NPD	Perr	Vers	DSD	Para	Para	Mon	Mon	Limi	Cha	Lim	Lim	Stat	Limi	Lim	Mon	DMF	DMF	NOD	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAll	>=	6	07/3 =	6.8										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAll	>=	6	08/3 =	6.2										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAll	>=	6	09/3 =	7										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAll	>=	6	10/3 =	7										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAll	>=	6	11/3 =	7										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAll	>=	6	12/3 =	6.6										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAll	>=	6	01/3 =	6										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAll	>=	6	02/2 =	6.3										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAll	>=	6	03/3 =	7.1										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAll	>=	6	04/3 =	7										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAll	>=	6	05/3 =	7.2										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAll	>=	6	06/3 =	6.9										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAll	>=	6	07/3 =	6.8										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAll	>=	6	08/3 =	7										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAll	>=	6	09/3 =	6.8										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAll	>=	6	10/3 =	6.8										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAll	>=	6	11/3 =	6.7										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAll	>=	6	12/3 =	6.7										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAll	>=	6	01/3 =	6.7										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAll	>=	6	02/2 =	6.9										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAll	>=	6	03/3 =	6.9										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAll	>=	6	04/3 =	6.8	D90									
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAll	>=	6	05/3 =	6.7										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAll	>=	6	06/3 =	6.8										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAll	>=	6	07/3 =	6.6										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAll	>=	6	08/3 =	6.8										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAll	>=	6	09/3 =	6.6										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAll	>=	6	10/3 =	7										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAll	>=	6	11/3 =	7.1										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C1	Star	DAll	>=	6	12/3 =	7										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	01/3 =	7.9	D90		K	Non	3/31	2		RE - 6/23		
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	02/2 =	7.8	D90		K	Non	4/28	2		RE - 6/23		
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	03/3 =	7.8										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	04/3 =	7.7										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	05/3 =	7.8										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	06/3 =	7.8										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	07/3 =	7.7										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	08/3 =	7.5										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	09/3 =	7.7										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	10/3 =	7.8										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	11/3 =	7.5										
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	12/3 =	7.6										

NPD	Perr	Vers	DSD	Para	Para	Mon	Mon	Limi	Cha	Lim	Limi	Stat	Lim	Limi	Mon	DMF	DMF	NOD	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	01/3	=	7.5									
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	02/2	=	7.7									
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	03/3	=	7.6									
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	04/3	=	7.6									
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	05/3	=	7.7									
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	06/3	=	7.7									
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	07/3	=	7.8									
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	08/3	=	7.6									
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	09/3	=	7.6									
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	10/3	=	7.5									
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	11/3	=	7.3									
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	12/3	=	7.4									
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	01/3	=	7.6									
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	02/2	=	7.4									
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	03/3	=	7.6									
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	04/3	=	7.3	D90	K	Non	6/28	2	RE - 7/26			
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	05/3	=	7.2									
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	06/3	=	7.4									
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	07/3	=	7.4									
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	08/3	=	7.4									
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	09/3	=	7.4									
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	10/3	=	7.6									
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	11/3	=	7.6									
AL0	ABC	0	001	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	9	12/3	=	7.5									
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	01/3	=	4.8	D90	N	Non	3/31	2	RE - 6/23			
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	02/2	=	2.3	D90	N	Non	4/28	2	RE - 6/23			
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	03/3	=	5.4									
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	04/3	=	3.3									
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	05/3	=	3.5									
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	06/3	=	7.8									
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	07/3	=	3.5									
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	08/3	=	4.8									
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	09/3	=	4.2									
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	10/3	=	4.3									
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	11/3	=	6									
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	12/3	=	###									
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	01/3	=	35									
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	02/2	=	###									
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	03/3	=	9.4									
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	04/3	=	4.5									
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	05/3	=	4									
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	06/3	=	4.2									

NPD	Perr	Vers	DSD	Para	Para	Mon	Mon	Lim	Cha	Lim	Lim	Stat	Limi	Lim	Mon	DMF	DMF	NOD	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	07/3 =	7.5										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	08/3 =	6.2										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	09/3 =	9.8										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	10/3 =	###										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	11/3 =	9.2										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	12/3 =	19										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	01/3 =	###										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	02/2 =	###										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	03/3 =	###										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	04/3 =	###			D90		N	Non	6/28	2	RE - 7/26	
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	05/3 =	7.6										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	06/3 =	6.3										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	07/3 =	7.5										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	08/3 =	9.4										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	09/3 =	5.8										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	10/3 =	7.4										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	11/3 =	###										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q1	Pour	MO	<=	342	12/3 =	8										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Pour	DAll	<=	513	01/3 =	6			D90		K	Non	3/31	2	RE - 6/23	
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Pour	DAll	<=	513	02/2 =	3			D90		K	Non	4/28	2	RE - 6/23	
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Pour	DAll	<=	513	03/3 =	13										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Pour	DAll	<=	513	04/3 =	6										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Pour	DAll	<=	513	05/3 =	6										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Pour	DAll	<=	513	06/3 =	26										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Pour	DAll	<=	513	07/3 =	6										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Pour	DAll	<=	513	08/3 =	8										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Pour	DAll	<=	513	09/3 =	8										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Pour	DAll	<=	513	10/3 =	8										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Pour	DAll	<=	513	11/3 =	11										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Pour	DAll	<=	513	12/3 =	24										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Pour	DAll	<=	513	01/3 =	53										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Pour	DAll	<=	513	02/2 =	39										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Pour	DAll	<=	513	03/3 =	20										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Pour	DAll	<=	513	04/3 =	6										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Pour	DAll	<=	513	05/3 =	9										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Pour	DAll	<=	513	06/3 =	9										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Pour	DAll	<=	513	07/3 =	11										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Pour	DAll	<=	513	08/3 =	11										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Pour	DAll	<=	513	09/3 =	18										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Pour	DAll	<=	513	10/3 =	13										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Pour	DAll	<=	513	11/3 =	12										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Pour	DAll	<=	513	12/3 =	36										

NPC	Perr	Vers	DSE	Para	Para	Mon	Mon	Limi	Cha	Limi	Limi	Stat	Limi	Limi	Mon	DMF	DMF	NOE	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Poui	DAll	<=	513	01/3 =	28										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Poui	DAll	<=	513	02/2 =	23										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Poui	DAll	<=	513	03/3 =	17										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Poui	DAll	<=	513	04/3 =	16	D90		K		Non	6/28	2		RE -	7/26
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Poui	DAll	<=	513	05/3 =	10										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Poui	DAll	<=	513	06/3 =	11										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Poui	DAll	<=	513	07/3 =	16										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Poui	DAll	<=	513	08/3 =	14										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Poui	DAll	<=	513	09/3 =	9										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Poui	DAll	<=	513	10/3 =	13										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Poui	DAll	<=	513	11/3 =	16										
AL0	ABC	0	001	005	Solic	1	Efflu	0	Base	Q2	Poui	DAll	<=	513	12/3 =	12										
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q1	Poui	MO	<=	66	05/3 =	6										
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q1	Poui	MO	<=	66	06/3 =	8.6										
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q1	Poui	MO	<=	66	07/3 =	6.9										
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q1	Poui	MO	<=	66	08/3 =	6.5										
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q1	Poui	MO	<=	66	09/3 =	16										
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q1	Poui	MO	<=	66	10/3 =	7.5										
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q1	Poui	MO	<=	66	11/3 =	9.5										
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q1	Poui	MO	<=	66	05/3 =	8.8										
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q1	Poui	MO	<=	66	06/3 =	9.6										
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q1	Poui	MO	<=	66	07/3 =	###										
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q1	Poui	MO	<=	66	08/3 =	9										
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q1	Poui	MO	<=	66	09/3 =	9										
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q1	Poui	MO	<=	66	10/3 =	###										
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q1	Poui	MO	<=	66	11/3 =	8.6										
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q1	Poui	MO	<=	66	05/3 =	15										
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q1	Poui	MO	<=	66	06/3 =	7.3										
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q1	Poui	MO	<=	66	07/3 =	9										
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q1	Poui	MO	<=	66	08/3 =	8.6										
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q1	Poui	MO	<=	66	09/3 =	7.8										
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q1	Poui	MO	<=	66	10/3 =	7.8										
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q1	Poui	MO	<=	66	11/3 =	8.8										
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q2	Poui	DAll	<=	99	05/3 =	8.4										
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q2	Poui	DAll	<=	99	06/3 =	13										
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q2	Poui	DAll	<=	99	07/3 =	9.2										
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q2	Poui	DAll	<=	99	08/3 =	7.8										
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q2	Poui	DAll	<=	99	09/3 =	53										
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q2	Poui	DAll	<=	99	10/3 =	9										
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q2	Poui	DAll	<=	99	11/3 =	11										
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q2	Poui	DAll	<=	99	05/3 =	10										
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q2	Poui	DAll	<=	99	06/3 =	###										

NPD	Perr	Vers	DSD	Para	Para	Mon	Mon	Lim	Cha	Lim	Lim	Stat	Lim	Lim	Mon	DMF	DMF	NOD	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q2	Pou	DAll	<=	99	07/3	=	###									
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q2	Pou	DAll	<=	99	08/3	=	###									
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q2	Pou	DAll	<=	99	09/3	=	10									
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q2	Pou	DAll	<=	99	10/3	=	11									
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q2	Pou	DAll	<=	99	11/3	=	10									
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q2	Pou	DAll	<=	99	05/3	=	24									
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q2	Pou	DAll	<=	99	06/3	=	9.1									
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q2	Pou	DAll	<=	99	07/3	=	10									
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q2	Pou	DAll	<=	99	08/3	=	11									
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q2	Pou	DAll	<=	99	09/3	=	8									
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q2	Pou	DAll	<=	99	10/3	=	8.9									
AL0	ABC	0	001	006	Nitrc	1	Efflu	0	Base	Q2	Pou	DAll	<=	99	11/3	=	10									
AL0	ABC	0	001	006	Nitrc	1	Efflu	1	Base	Q1	Pou	MO	<=	232	01/3	=	3.5		D90		N	Non	3/31	2		RE - 6/23
AL0	ABC	0	001	006	Nitrc	1	Efflu	1	Base	Q1	Pou	MO	<=	232	02/2	=	2.8		D90		N	Non	4/28	2		RE - 6/23
AL0	ABC	0	001	006	Nitrc	1	Efflu	1	Base	Q1	Pou	MO	<=	232	03/3	=	2.8									
AL0	ABC	0	001	006	Nitrc	1	Efflu	1	Base	Q1	Pou	MO	<=	232	04/3	=	6.8									
AL0	ABC	0	001	006	Nitrc	1	Efflu	1	Base	Q1	Pou	MO	<=	232	12/3	=	14									
AL0	ABC	0	001	006	Nitrc	1	Efflu	1	Base	Q1	Pou	MO	<=	232	01/3	=	###									
AL0	ABC	0	001	006	Nitrc	1	Efflu	1	Base	Q1	Pou	MO	<=	232	02/2	=	###									
AL0	ABC	0	001	006	Nitrc	1	Efflu	1	Base	Q1	Pou	MO	<=	232	03/3	=	###									
AL0	ABC	0	001	006	Nitrc	1	Efflu	1	Base	Q1	Pou	MO	<=	232	04/3	=	8.8									
AL0	ABC	0	001	006	Nitrc	1	Efflu	1	Base	Q1	Pou	MO	<=	232	12/3	=	9.3									
AL0	ABC	0	001	006	Nitrc	1	Efflu	1	Base	Q1	Pou	MO	<=	232	01/3	=	10									
AL0	ABC	0	001	006	Nitrc	1	Efflu	1	Base	Q1	Pou	MO	<=	232	02/2	=	8.8									
AL0	ABC	0	001	006	Nitrc	1	Efflu	1	Base	Q1	Pou	MO	<=	232	03/3	=	8.7									
AL0	ABC	0	001	006	Nitrc	1	Efflu	1	Base	Q1	Pou	MO	<=	232	04/3	=	9.5		D90		N	Non	6/28	2		RE - 7/26
AL0	ABC	0	001	006	Nitrc	1	Efflu	1	Base	Q1	Pou	MO	<=	232	12/3	=	8.7									
AL0	ABC	0	001	006	Nitrc	1	Efflu	1	Base	Q2	Pou	DAll	<=	348	01/3	=	4.9		D90		K	Non	3/31	2		RE - 6/23
AL0	ABC	0	001	006	Nitrc	1	Efflu	1	Base	Q2	Pou	DAll	<=	348	02/2	=	5		D90		K	Non	4/28	2		RE - 6/23
AL0	ABC	0	001	006	Nitrc	1	Efflu	1	Base	Q2	Pou	DAll	<=	348	03/3	=	7									
AL0	ABC	0	001	006	Nitrc	1	Efflu	1	Base	Q2	Pou	DAll	<=	348	04/3	=	9.2									
AL0	ABC	0	001	006	Nitrc	1	Efflu	1	Base	Q2	Pou	DAll	<=	348	12/3	=	31									
AL0	ABC	0	001	006	Nitrc	1	Efflu	1	Base	Q2	Pou	DAll	<=	348	01/3	=	31									
AL0	ABC	0	001	006	Nitrc	1	Efflu	1	Base	Q2	Pou	DAll	<=	348	02/2	=	13									
AL0	ABC	0	001	006	Nitrc	1	Efflu	1	Base	Q2	Pou	DAll	<=	348	03/3	=	11									
AL0	ABC	0	001	006	Nitrc	1	Efflu	1	Base	Q2	Pou	DAll	<=	348	04/3	=	10									
AL0	ABC	0	001	006	Nitrc	1	Efflu	1	Base	Q2	Pou	DAll	<=	348	12/3	=	10									
AL0	ABC	0	001	006	Nitrc	1	Efflu	1	Base	Q2	Pou	DAll	<=	348	01/3	=	12									
AL0	ABC	0	001	006	Nitrc	1	Efflu	1	Base	Q2	Pou	DAll	<=	348	02/2	=	10									
AL0	ABC	0	001	006	Nitrc	1	Efflu	1	Base	Q2	Pou	DAll	<=	348	03/3	=	###									
AL0	ABC	0	001	006	Nitrc	1	Efflu	1	Base	Q2	Pou	DAll	<=	348	04/3	=	###		D90		K	Non	6/28	2		RE - 7/26
AL0	ABC	0	001	006	Nitrc	1	Efflu	1	Base	Q2	Pou	DAll	<=	348	12/3	=	###									

NPD	Perr	Vers	DSD	Para	Para	Mon	Mon	Limi	Cha	Lim	Lim	Stat	Lim	Lim	Mon	DMF	DMF	NOD	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	01/3 =	###		D90		N	Non	3/31	2	RE - 6/23		
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	02/2 =	###		D90		N	Non	4/28	2	RE - 6/23		
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	03/3 =	###										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	04/3 =	2.2										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	05/3 =	###										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	06/3 =	###										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	07/3 =	###										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	08/3 =	1.4										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	09/3 =	###										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	10/3 =	2										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	11/3 =	###										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	12/3 =	###										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	01/3 =	###										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	02/2 =	2.2										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	03/3 =	1.9										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	04/3 =	.6										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	05/3 =	.95										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	06/3 =	.8										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	07/3 =	1.4										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	08/3 =	###										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	09/3 =	###										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	10/3 =	1.9										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	11/3 =	5										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	12/3 =	4.4										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	01/3 =	1.5										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	02/2 =	5.2										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	03/3 =	1.8										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	04/3 =	2		D90		N	Non	6/28	2	RE - 7/26		
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	05/3 =	1.5										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	06/3 =	.88										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	07/3 =	.73										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	08/3 =	###										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	09/3 =	2.4										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	10/3 =	###										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	11/3 =	5.5										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q1	Poul	MO	<=	###	12/3 =	5.4										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Poul	DAll	<=	###	01/3 =	###		D90		K	Non	3/31	2	RE - 6/23		
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Poul	DAll	<=	###	02/2 =	###		D90		K	Non	4/28	2	RE - 6/23		
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Poul	DAll	<=	###	03/3 =	###										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Poul	DAll	<=	###	04/3 =	3.5										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Poul	DAll	<=	###	05/3 =	3.1										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Poul	DAll	<=	###	06/3 =	3.2										

NPD	Perr	Vers	DSD	Para	Para	Mon	Mon	Limi	Cha	Lim	Limi	Stat	Limi	Limi	Mon	DMR	DMR	NOD	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	07/3 =	8.1										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	08/3 =	1.8										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	09/3 =	###										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	10/3 =	2										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	11/3 =	3.6										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	12/3 =	###										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	01/3 =	###										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	02/2 =	3.4										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	03/3 =	2.3										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	04/3 =	.7										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	05/3 =	1.1										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	06/3 =	.8										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	07/3 =	2.2										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	08/3 =	1.6										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	09/3 =	2.6										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	10/3 =	2.2										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	11/3 =	6										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	12/3 =	5.8										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	01/3 =	2										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	02/2 =	6.8										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	03/3 =	2.3										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	04/3 =	2.2	D90	K	Non	6/28	2	RE - 7/26				
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	05/3 =	2.5										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	06/3 =	###										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	07/3 =	.95										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	08/3 =	###										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	09/3 =	3										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	10/3 =	4.2										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	11/3 =	7.7										
AL0	ABC	0	001	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	12/3 =	7										
AL0	ABC	0	001	010	Iron,	1	Efflu	0	Base	Q1	Pour	MO	<=	7.5	01/3 =	1.9	D90	N	Non	3/31	2	RE - 6/23				
AL0	ABC	0	001	010	Iron,	1	Efflu	0	Base	Q1	Pour	MO	<=	7.5	02/2 =	1.3	D90	N	Non	4/28	2	RE - 6/23				
AL0	ABC	0	001	010	Iron,	1	Efflu	0	Base	Q1	Pour	MO	<=	7.5	03/3 =	1.2										
AL0	ABC	0	001	010	Iron,	1	Efflu	0	Base	Q1	Pour	MO	<=	7.5	04/3 =	1.4										
AL0	ABC	0	001	010	Iron,	1	Efflu	0	Base	Q1	Pour	MO	<=	7.5	05/3 =	1.3										
AL0	ABC	0	001	010	Iron,	1	Efflu	0	Base	Q1	Pour	MO	<=	7.5	06/3 =	1.7										
AL0	ABC	0	001	010	Iron,	1	Efflu	0	Base	Q1	Pour	MO	<=	7.5	07/3 =	1.7										
AL0	ABC	0	001	010	Iron,	1	Efflu	0	Base	Q1	Pour	MO	<=	7.5	08/3 =											
AL0	ABC	0	001	010	Iron,	1	Efflu	0	Base	Q1	Pour	MO	<=	7.5	09/3 =	1.5										
AL0	ABC	0	001	010	Iron,	1	Efflu	0	Base	Q1	Pour	MO	<=	7.5	10/3 =	.5										
AL0	ABC	0	001	010	Iron,	1	Efflu	0	Base	Q1	Pour	MO	<=	7.5	11/3 =	.5										
AL0	ABC	0	001	010	Iron,	1	Efflu	0	Base	Q1	Pour	MO	<=	7.5	12/3 =	1.9										

NPD	Perr	Vers	DSD	Para	Para	Mon	Mon	Lim	Cha	Lim	Lim	Stat	Lim	Lim	Mon	DMF	DMF	NOD	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q1	Pou	MO	<=	7.5	01/3 =		4.3										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q1	Pou	MO	<=	7.5	02/2 =		5.8										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q1	Pou	MO	<=	7.5	03/3 =		1.6										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q1	Pou	MO	<=	7.5	04/3 =		1.1										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q1	Pou	MO	<=	7.5	05/3 =		.7										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q1	Pou	MO	<=	7.5	06/3 =		1.5										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q1	Pou	MO	<=	7.5	07/3 =		.8										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q1	Pou	MO	<=	7.5	08/3 =		1.6										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q1	Pou	MO	<=	7.5	09/3 =		2.9										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q1	Pou	MO	<=	7.5	10/3 =		3.5										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q1	Pou	MO	<=	7.5	11/3 =		2.7										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q1	Pou	MO	<=	7.5	12/3 =		3.7										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q1	Pou	MO	<=	7.5	01/3 =		3.9										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q1	Pou	MO	<=	7.5	02/2 =		1.8										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q1	Pou	MO	<=	7.5	03/3 =		3.1										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q1	Pou	MO	<=	7.5	04/3 =		2.7			D90		N	Non	6/28	2	RE - 7/26	
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q1	Pou	MO	<=	7.5	05/3 =		2.9										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q1	Pou	MO	<=	7.5	06/3 =		2										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q1	Pou	MO	<=	7.5	07/3 =		.9										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q1	Pou	MO	<=	7.5	08/3 =		2.2										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q1	Pou	MO	<=	7.5	09/3 =		1.7										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q1	Pou	MO	<=	7.5	10/3 =		1.4										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q1	Pou	MO	<=	7.5	11/3 =		3.5										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q1	Pou	MO	<=	7.5	12/3 =		4.1										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q2	Pou	DAll	<=	15	01/3 =		1.9			D90		K	Non	3/31	2	RE - 6/23	
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q2	Pou	DAll	<=	15	02/2 =		1.3			D90		K	Non	4/28	2	RE - 6/23	
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q2	Pou	DAll	<=	15	03/3 =		1.2										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q2	Pou	DAll	<=	15	04/3 =		1.4										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q2	Pou	DAll	<=	15	05/3 =		1.3										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q2	Pou	DAll	<=	15	06/3 =		1.7										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q2	Pou	DAll	<=	15	07/3 =		1.7										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q2	Pou	DAll	<=	15	08/3 =												
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q2	Pou	DAll	<=	15	09/3 =		1.5										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q2	Pou	DAll	<=	15	10/3 =		.5										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q2	Pou	DAll	<=	15	11/3 =		.5										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q2	Pou	DAll	<=	15	12/3 =		1.9										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q2	Pou	DAll	<=	15	01/3 =		4.3										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q2	Pou	DAll	<=	15	02/2 =		5.8										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q2	Pou	DAll	<=	15	03/3 =		1.6										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q2	Pou	DAll	<=	15	04/3 =		1.1										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q2	Pou	DAll	<=	15	05/3 =		.7										
AL0	ABC	0	001	010	Iron, 1	Efflu	0	Base	Q2	Pou	DAll	<=	15	06/3 =		1.5										

NPD	Perr	Vers	DSC	Para	Para	Mon	Mon	Limi	Cha	Lim	Limi	Stat	Limi	Lim	Mon	DMF	DMF	NOD	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC		0 001	010	Iron, 1		Efflu	0	Base	Q2	Pour	DAll	<=	15	07/3 =	.8									
AL0	ABC		0 001	010	Iron, 1		Efflu	0	Base	Q2	Pour	DAll	<=	15	08/3 =	1.6									
AL0	ABC		0 001	010	Iron, 1		Efflu	0	Base	Q2	Pour	DAll	<=	15	09/3 =	2.9									
AL0	ABC		0 001	010	Iron, 1		Efflu	0	Base	Q2	Pour	DAll	<=	15	10/3 =	3.5									
AL0	ABC		0 001	010	Iron, 1		Efflu	0	Base	Q2	Pour	DAll	<=	15	11/3 =	2.7									
AL0	ABC		0 001	010	Iron, 1		Efflu	0	Base	Q2	Pour	DAll	<=	15	12/3 =	3.7									
AL0	ABC		0 001	010	Iron, 1		Efflu	0	Base	Q2	Pour	DAll	<=	15	01/3 =	3.9									
AL0	ABC		0 001	010	Iron, 1		Efflu	0	Base	Q2	Pour	DAll	<=	15	02/2 =	1.8									
AL0	ABC		0 001	010	Iron, 1		Efflu	0	Base	Q2	Pour	DAll	<=	15	03/3 =	3.1									
AL0	ABC		0 001	010	Iron, 1		Efflu	0	Base	Q2	Pour	DAll	<=	15	04/3 =	2.7		D90		K	Non	6/28	2		RE - 7/26
AL0	ABC		0 001	010	Iron, 1		Efflu	0	Base	Q2	Pour	DAll	<=	15	05/3 =	2.9									
AL0	ABC		0 001	010	Iron, 1		Efflu	0	Base	Q2	Pour	DAll	<=	15	06/3 =	2									
AL0	ABC		0 001	010	Iron, 1		Efflu	0	Base	Q2	Pour	DAll	<=	15	07/3 =	.9									
AL0	ABC		0 001	010	Iron, 1		Efflu	0	Base	Q2	Pour	DAll	<=	15	08/3 =	2.2									
AL0	ABC		0 001	010	Iron, 1		Efflu	0	Base	Q2	Pour	DAll	<=	15	09/3 =	1.7									
AL0	ABC		0 001	010	Iron, 1		Efflu	0	Base	Q2	Pour	DAll	<=	15	10/3 =	1.4									
AL0	ABC		0 001	010	Iron, 1		Efflu	0	Base	Q2	Pour	DAll	<=	15	11/3 =	3.5									
AL0	ABC		0 001	010	Iron, 1		Efflu	0	Base	Q2	Pour	DAll	<=	15	12/3 =	4.1									
AL0	ABC		0 001	010	Man 1		Efflu	0	Base	Q1	Pour	MO	<=	5	01/3 =			D90		N	Non	3/31	2		RE - 6/23
AL0	ABC		0 001	010	Man 1		Efflu	0	Base	Q1	Pour	MO	<=	5	02/2 =			D90		N	Non	4/28	2		RE - 6/23
AL0	ABC		0 001	010	Man 1		Efflu	0	Base	Q1	Pour	MO	<=	5	03/3 =	.1									
AL0	ABC		0 001	010	Man 1		Efflu	0	Base	Q1	Pour	MO	<=	5	04/3 =	.1									
AL0	ABC		0 001	010	Man 1		Efflu	0	Base	Q1	Pour	MO	<=	5	05/3 =	.15									
AL0	ABC		0 001	010	Man 1		Efflu	0	Base	Q1	Pour	MO	<=	5	06/3 =	.1									
AL0	ABC		0 001	010	Man 1		Efflu	0	Base	Q1	Pour	MO	<=	5	07/3 =	.1									
AL0	ABC		0 001	010	Man 1		Efflu	0	Base	Q1	Pour	MO	<=	5	08/3 =	.74									
AL0	ABC		0 001	010	Man 1		Efflu	0	Base	Q1	Pour	MO	<=	5	09/3 =	.1									
AL0	ABC		0 001	010	Man 1		Efflu	0	Base	Q1	Pour	MO	<=	5	10/3 =	.3									
AL0	ABC		0 001	010	Man 1		Efflu	0	Base	Q1	Pour	MO	<=	5	11/3 =	.3									
AL0	ABC		0 001	010	Man 1		Efflu	0	Base	Q1	Pour	MO	<=	5	12/3 =	.13									
AL0	ABC		0 001	010	Man 1		Efflu	0	Base	Q1	Pour	MO	<=	5	01/3 =	.3									
AL0	ABC		0 001	010	Man 1		Efflu	0	Base	Q1	Pour	MO	<=	5	02/2 =	.2									
AL0	ABC		0 001	010	Man 1		Efflu	0	Base	Q1	Pour	MO	<=	5	03/3 =	.3									
AL0	ABC		0 001	010	Man 1		Efflu	0	Base	Q1	Pour	MO	<=	5	04/3 =	.3									
AL0	ABC		0 001	010	Man 1		Efflu	0	Base	Q1	Pour	MO	<=	5	05/3 =	.19									
AL0	ABC		0 001	010	Man 1		Efflu	0	Base	Q1	Pour	MO	<=	5	06/3 =	.3									
AL0	ABC		0 001	010	Man 1		Efflu	0	Base	Q1	Pour	MO	<=	5	07/3 =	.4									
AL0	ABC		0 001	010	Man 1		Efflu	0	Base	Q1	Pour	MO	<=	5	08/3 =	.16									
AL0	ABC		0 001	010	Man 1		Efflu	0	Base	Q1	Pour	MO	<=	5	09/3 =	.1									
AL0	ABC		0 001	010	Man 1		Efflu	0	Base	Q1	Pour	MO	<=	5	10/3 =	.2									
AL0	ABC		0 001	010	Man 1		Efflu	0	Base	Q1	Pour	MO	<=	5	11/3 =	.2									
AL0	ABC		0 001	010	Man 1		Efflu	0	Base	Q1	Pour	MO	<=	5	12/3 =	.2									

NPC	Perr	Vers	DSC	Para	Para	Mon	Mon	Lim	Cha	Lim	Lim	Stat	Lim	Lim	Mon	DMF	DMF	NOD	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q1	Pou	MO	<=	5	01/3 =	.2										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q1	Pou	MO	<=	5	02/2 =	.4										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q1	Pou	MO	<=	5	03/3 =	.2										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q1	Pou	MO	<=	5	04/3 =	.2			D90	N	Non	6/28	2	RE - 7/26		
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q1	Pou	MO	<=	5	05/3 =	.2										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q1	Pou	MO	<=	5	06/3 =	.1										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q1	Pou	MO	<=	5	07/3 =	.2										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q1	Pou	MO	<=	5	08/3 =	.2										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q1	Pou	MO	<=	5	09/3 =	.2										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q1	Pou	MO	<=	5	10/3 =	.2										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q1	Pou	MO	<=	5	11/3 =	.2										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q1	Pou	MO	<=	5	12/3 =	.2										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Pou	DAll	<=	10	01/3 =				D90	K	Non	3/31	2	RE - 6/23		
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Pou	DAll	<=	10	02/2 =				D90	K	Non	4/28	2	RE - 6/23		
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Pou	DAll	<=	10	03/3 =	.1										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Pou	DAll	<=	10	04/3 =	.1										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Pou	DAll	<=	10	05/3 =	.15										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Pou	DAll	<=	10	06/3 =	.1										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Pou	DAll	<=	10	07/3 =	.1										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Pou	DAll	<=	10	08/3 =	.74										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Pou	DAll	<=	10	09/3 =	.1										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Pou	DAll	<=	10	10/3 =	.3										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Pou	DAll	<=	10	11/3 =	.3										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Pou	DAll	<=	10	12/3 =	.13										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Pou	DAll	<=	10	01/3 =	.3										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Pou	DAll	<=	10	02/2 =	.2										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Pou	DAll	<=	10	03/3 =	.3										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Pou	DAll	<=	10	04/3 =	.3										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Pou	DAll	<=	10	05/3 =	.19										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Pou	DAll	<=	10	06/3 =	.3										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Pou	DAll	<=	10	07/3 =	.4										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Pou	DAll	<=	10	08/3 =	.16										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Pou	DAll	<=	10	09/3 =	.1										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Pou	DAll	<=	10	10/3 =	.2										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Pou	DAll	<=	10	11/3 =	.2										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Pou	DAll	<=	10	12/3 =	.2										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Pou	DAll	<=	10	01/3 =	.2										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Pou	DAll	<=	10	02/2 =	.4										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Pou	DAll	<=	10	03/3 =	.2										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Pou	DAll	<=	10	04/3 =	.2			D90	K	Non	6/28	2	RE - 7/26		
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Pou	DAll	<=	10	05/3 =	.2										
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Pou	DAll	<=	10	06/3 =	.1										

NPD	Perr	Vers	DSD	Para	Para	Mon	Mon	Limi	Cha	Lim	Limi	Stat	Limi	Limi	Mon	DMF	DMF	NOD	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Poul	DAIL	<=	10	07/3	=	.2									
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Poul	DAIL	<=	10	08/3	=	.2									
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Poul	DAIL	<=	10	09/3	=	.2									
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Poul	DAIL	<=	10	10/3	=	.2									
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Poul	DAIL	<=	10	11/3	=	.2									
AL0	ABC	0	001	010	Man	1	Efflu	0	Base	Q2	Poul	DAIL	<=	10	12/3	=	.2									
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	01/3	=			D90		N	Non	3/31	2	RE - 6/23	
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	02/2	=			D90		N	Non	4/28	2	RE - 6/23	
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	03/3	=										
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	04/3	=										
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	05/3	=										
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	06/3	=										
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	07/3	=										
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	08/3	=										
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	09/3	=										
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	10/3	=										
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	11/3	=										
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	12/3	=										
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	01/3	=										
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	02/2	=										
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	03/3	=										
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	04/3	=										
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	05/3	=										
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	06/3	=										
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	07/3	=										
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	08/3	=										
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	09/3	=										
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	10/3	=										
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	11/3	=										
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	12/3	=										
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	01/3	=										
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	02/2		B									
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	03/3		B									
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	04/3		B		D90		N	Non	6/28	2	RE - 7/26	
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	05/3		B									
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	06/3		B									
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	07/3		B									
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	08/3		B									
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	09/3		B									
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	10/3		B									
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	11/3		B									
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q1	Poul	MO	<=	25	12/3		B									

NPD	Perr	Vers	DSD	Para	Para	Mon	Mon	Limi	Cha	Lim	Lim	Stat	Lim	Lim	Mon	DMF	DMF	NOD	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	01/3 =				D90		K	Non	3/31	2	RE - 6/23	
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	02/2 =				D90		K	Non	4/28	2	RE - 6/23	
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	03/3 =											
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	04/3 =											
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	05/3 =											
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	06/3 =											
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	07/3 =											
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	08/3 =											
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	09/3 =											
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	10/3 =											
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	11/3 =											
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	12/3 =											
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	01/3 =											
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	02/2 =											
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	03/3 =											
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	04/3 =											
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	05/3 =											
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	06/3 =											
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	07/3 =											
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	08/3 =											
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	09/3 =											
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	10/3 =											
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	11/3 =											
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	12/3 =											
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	01/3 =											
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	02/2			B								
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	03/3			B								
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	04/3			B	D90		K	Non	6/28	2	RE - 7/26	
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	05/3			B								
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	06/3			B								
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	07/3			B								
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	08/3			B								
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	09/3			B								
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	10/3			B								
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	11/3			B								
AL0	ABC	0	001	035	Oil a	1	Efflu	0	Base	Q2	Poui	DAll	<=	###	12/3			B								
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Poui	MO	<=	###	01/3 =				D90		N	Non	3/31	2	RE - 6/23	
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Poui	MO	<=	###	02/2 =				D90		N	Non	4/28	2	RE - 6/23	
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Poui	MO	<=	###	03/3 =											
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Poui	MO	<=	###	04/3 =											
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Poui	MO	<=	###	05/3 =											
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Poui	MO	<=	###	06/3 =											

NPC	Perr	Vers	DSC	Para	Para	Mon	Mon	Lim	Cha	Lim	Lim	Stat	Lim	Lim	Mon	DMF	DMF	NOL	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Pour	MO	<=	###	07/3 =											
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Pour	MO	<=	###	08/3 =											
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Pour	MO	<=	###	09/3 =											
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Pour	MO	<=	###	10/3 =											
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Pour	MO	<=	###	11/3 =											
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Pour	MO	<=	###	12/3 =											
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Pour	MO	<=	###	01/3 =											
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Pour	MO	<=	###	02/2 =											
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Pour	MO	<=	###	03/3 =											
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Pour	MO	<=	###	04/3 =											
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Pour	MO	<=	###	05/3 =											
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Pour	MO	<=	###	06/3 =											
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Pour	MO	<=	###	07/3 =											
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Pour	MO	<=	###	08/3 =											
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Pour	MO	<=	###	09/3 =											
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Pour	MO	<=	###	10/3 =											
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Pour	MO	<=	###	11/3 =											
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Pour	MO	<=	###	12/3 =											
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Pour	MO	<=	###	01/3 =											
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Pour	MO	<=	###	02/2		B									
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Pour	MO	<=	###	03/3		B									
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Pour	MO	<=	###	04/3		B	D90		N	Non	6/28	2		RE - 7/26	
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Pour	MO	<=	###	05/3		B									
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Pour	MO	<=	###	06/3		B									
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Pour	MO	<=	###	07/3		B									
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Pour	MO	<=	###	08/3		B									
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Pour	MO	<=	###	09/3		B									
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Pour	MO	<=	###	10/3		B									
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Pour	MO	<=	###	11/3		B									
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q1	Pour	MO	<=	###	12/3		B									
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	01/3 =			D90		K	Non	3/31	2		RE - 6/23	
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	02/2 =			D90		K	Non	4/28	2		RE - 6/23	
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	03/3 =											
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	04/3 =											
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	05/3 =											
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	06/3 =											
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	07/3 =											
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	08/3 =											
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	09/3 =											
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	10/3 =											
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	11/3 =											
AL0	ABC	0	001	342	Ben:	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	12/3 =											

NPC	Perr	Vers	DSC	Para	Para	Mon	Mon	Limi	Cha	Lim	Limi	Stat	Lim	Lim	Mon	DMF	DMF	NOC	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	001	342	Ben	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	01/3 =											
AL0	ABC	0	001	342	Ben	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	02/2 =											
AL0	ABC	0	001	342	Ben	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	03/3 =											
AL0	ABC	0	001	342	Ben	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	04/3 =											
AL0	ABC	0	001	342	Ben	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	05/3 =											
AL0	ABC	0	001	342	Ben	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	06/3 =											
AL0	ABC	0	001	342	Ben	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	07/3 =											
AL0	ABC	0	001	342	Ben	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	08/3 =											
AL0	ABC	0	001	342	Ben	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	09/3 =											
AL0	ABC	0	001	342	Ben	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	10/3 =											
AL0	ABC	0	001	342	Ben	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	11/3 =											
AL0	ABC	0	001	342	Ben	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	12/3 =											
AL0	ABC	0	001	342	Ben	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	01/3 =											
AL0	ABC	0	001	342	Ben	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	02/2			B								
AL0	ABC	0	001	342	Ben	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	03/3			B								
AL0	ABC	0	001	342	Ben	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	04/3			B	D90		K	Non	6/28	2	RE -	7/26
AL0	ABC	0	001	342	Ben	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	05/3			B								
AL0	ABC	0	001	342	Ben	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	06/3			B								
AL0	ABC	0	001	342	Ben	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	07/3			B								
AL0	ABC	0	001	342	Ben	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	08/3			B								
AL0	ABC	0	001	342	Ben	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	09/3			B								
AL0	ABC	0	001	342	Ben	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	10/3			B								
AL0	ABC	0	001	342	Ben	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	11/3			B								
AL0	ABC	0	001	342	Ben	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	12/3			B								
AL0	ABC	0	001	346	Nap	1	Efflu	0	Base	Q1	Pour	MO	<=	.15	01/3 =				D90		N	Non	3/31	2	RE -	6/23
AL0	ABC	0	001	346	Nap	1	Efflu	0	Base	Q1	Pour	MO	<=	.15	02/2 =				D90		N	Non	4/28	2	RE -	6/23
AL0	ABC	0	001	346	Nap	1	Efflu	0	Base	Q1	Pour	MO	<=	.15	03/3 =											
AL0	ABC	0	001	346	Nap	1	Efflu	0	Base	Q1	Pour	MO	<=	.15	04/3 =											
AL0	ABC	0	001	346	Nap	1	Efflu	0	Base	Q1	Pour	MO	<=	.15	05/3 =											
AL0	ABC	0	001	346	Nap	1	Efflu	0	Base	Q1	Pour	MO	<=	.15	06/3 =											
AL0	ABC	0	001	346	Nap	1	Efflu	0	Base	Q1	Pour	MO	<=	.15	07/3 =											
AL0	ABC	0	001	346	Nap	1	Efflu	0	Base	Q1	Pour	MO	<=	.15	08/3 =											
AL0	ABC	0	001	346	Nap	1	Efflu	0	Base	Q1	Pour	MO	<=	.15	09/3 =											
AL0	ABC	0	001	346	Nap	1	Efflu	0	Base	Q1	Pour	MO	<=	.15	10/3 =											
AL0	ABC	0	001	346	Nap	1	Efflu	0	Base	Q1	Pour	MO	<=	.15	11/3 =											
AL0	ABC	0	001	346	Nap	1	Efflu	0	Base	Q1	Pour	MO	<=	.15	12/3 =											
AL0	ABC	0	001	346	Nap	1	Efflu	0	Base	Q1	Pour	MO	<=	.15	01/3 =											
AL0	ABC	0	001	346	Nap	1	Efflu	0	Base	Q1	Pour	MO	<=	.15	02/2 =											
AL0	ABC	0	001	346	Nap	1	Efflu	0	Base	Q1	Pour	MO	<=	.15	03/3 =											
AL0	ABC	0	001	346	Nap	1	Efflu	0	Base	Q1	Pour	MO	<=	.15	04/3 =											
AL0	ABC	0	001	346	Nap	1	Efflu	0	Base	Q1	Pour	MO	<=	.15	05/3 =											
AL0	ABC	0	001	346	Nap	1	Efflu	0	Base	Q1	Pour	MO	<=	.15	06/3 =											

NPC	Perr	Vers	DSC	Para	Para	Mon	Mon	Limi	Cha	Lim	Limi	Stat	Limi	Lim	Mon	DMF	DMF	NOI	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q1	Poui	MO	<=	.15 07/3 =												
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q1	Poui	MO	<=	.15 08/3 =												
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q1	Poui	MO	<=	.15 09/3 =												
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q1	Poui	MO	<=	.15 10/3 =												
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q1	Poui	MO	<=	.15 11/3 =												
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q1	Poui	MO	<=	.15 12/3 =												
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q1	Poui	MO	<=	.15 01/3 =												
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q1	Poui	MO	<=	.15 02/2			B									
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q1	Poui	MO	<=	.15 03/3			B									
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q1	Poui	MO	<=	.15 04/3			B		D90		N	Non	6/28	2		RE - 7/26
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q1	Poui	MO	<=	.15 05/3			B									
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q1	Poui	MO	<=	.15 06/3			B									
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q1	Poui	MO	<=	.15 07/3			B									
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q1	Poui	MO	<=	.15 08/3			B									
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q1	Poui	MO	<=	.15 09/3			B									
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q1	Poui	MO	<=	.15 10/3			B									
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q1	Poui	MO	<=	.15 11/3			B									
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q1	Poui	MO	<=	.15 12/3			B									
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q2	Poui	DAII	<=	.15 01/3 =					D90		K	Non	3/31	2		RE - 6/23
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q2	Poui	DAII	<=	.15 02/2 =					D90		K	Non	4/28	2		RE - 6/23
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q2	Poui	DAII	<=	.15 03/3 =												
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q2	Poui	DAII	<=	.15 04/3 =												
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q2	Poui	DAII	<=	.15 05/3 =												
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q2	Poui	DAII	<=	.15 06/3 =												
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q2	Poui	DAII	<=	.15 07/3 =												
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q2	Poui	DAII	<=	.15 08/3 =												
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q2	Poui	DAII	<=	.15 09/3 =												
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q2	Poui	DAII	<=	.15 10/3 =												
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q2	Poui	DAII	<=	.15 11/3 =												
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q2	Poui	DAII	<=	.15 12/3 =												
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q2	Poui	DAII	<=	.15 01/3 =												
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q2	Poui	DAII	<=	.15 02/2 =												
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q2	Poui	DAII	<=	.15 03/3 =												
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q2	Poui	DAII	<=	.15 04/3 =												
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q2	Poui	DAII	<=	.15 05/3 =												
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q2	Poui	DAII	<=	.15 06/3 =												
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q2	Poui	DAII	<=	.15 07/3 =												
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q2	Poui	DAII	<=	.15 08/3 =												
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q2	Poui	DAII	<=	.15 09/3 =												
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q2	Poui	DAII	<=	.15 10/3 =												
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q2	Poui	DAII	<=	.15 11/3 =												
AL0	ABC		0 001	346	Nap	1	Efflu	0	Base	Q2	Poui	DAII	<=	.15 12/3 =												

NPC	Perr	Vers	DSC	Para	Para	Mon	Mon	Limi	Cha	Lim	Limi	Stat	Limi	Limi	Mon	DMF	DMF	NOI	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	001	346	Nap	1	Efflu	0	Base	Q2	Pour	DAll	<=	.15	01/3 =											
AL0	ABC	0	001	346	Nap	1	Efflu	0	Base	Q2	Pour	DAll	<=	.15	02/2			B								
AL0	ABC	0	001	346	Nap	1	Efflu	0	Base	Q2	Pour	DAll	<=	.15	03/3			B								
AL0	ABC	0	001	346	Nap	1	Efflu	0	Base	Q2	Pour	DAll	<=	.15	04/3			B	D90		K		Non	6/28	2	RE - 7/26
AL0	ABC	0	001	346	Nap	1	Efflu	0	Base	Q2	Pour	DAll	<=	.15	05/3			B								
AL0	ABC	0	001	346	Nap	1	Efflu	0	Base	Q2	Pour	DAll	<=	.15	06/3			B								
AL0	ABC	0	001	346	Nap	1	Efflu	0	Base	Q2	Pour	DAll	<=	.15	07/3			B								
AL0	ABC	0	001	346	Nap	1	Efflu	0	Base	Q2	Pour	DAll	<=	.15	08/3			B								
AL0	ABC	0	001	346	Nap	1	Efflu	0	Base	Q2	Pour	DAll	<=	.15	09/3			B								
AL0	ABC	0	001	346	Nap	1	Efflu	0	Base	Q2	Pour	DAll	<=	.15	10/3			B								
AL0	ABC	0	001	346	Nap	1	Efflu	0	Base	Q2	Pour	DAll	<=	.15	11/3			B								
AL0	ABC	0	001	346	Nap	1	Efflu	0	Base	Q2	Pour	DAll	<=	.15	12/3			B								
AL0	ABC	0	001	460	Phei	1	Efflu	0	Base	Q1	Pour	MO	<=	.17	01/3 =				D90		N		Non	3/31	2	RE - 6/23
AL0	ABC	0	001	460	Phei	1	Efflu	0	Base	Q1	Pour	MO	<=	.17	02/2 =		###		D90		N		Non	4/28	2	RE - 6/23
AL0	ABC	0	001	460	Phei	1	Efflu	0	Base	Q1	Pour	MO	<=	.17	03/3 =		.01									
AL0	ABC	0	001	460	Phei	1	Efflu	0	Base	Q1	Pour	MO	<=	.17	04/3 =		.01									
AL0	ABC	0	001	460	Phei	1	Efflu	0	Base	Q1	Pour	MO	<=	.17	05/3 =		.01									
AL0	ABC	0	001	460	Phei	1	Efflu	0	Base	Q1	Pour	MO	<=	.17	06/3 =		###									
AL0	ABC	0	001	460	Phei	1	Efflu	0	Base	Q1	Pour	MO	<=	.17	07/3 =											
AL0	ABC	0	001	460	Phei	1	Efflu	0	Base	Q1	Pour	MO	<=	.17	08/3 =		.01									
AL0	ABC	0	001	460	Phei	1	Efflu	0	Base	Q1	Pour	MO	<=	.17	09/3 =		.01									
AL0	ABC	0	001	460	Phei	1	Efflu	0	Base	Q1	Pour	MO	<=	.17	10/3 =		###									
AL0	ABC	0	001	460	Phei	1	Efflu	0	Base	Q1	Pour	MO	<=	.17	11/3 =		###									
AL0	ABC	0	001	460	Phei	1	Efflu	0	Base	Q1	Pour	MO	<=	.17	12/3 =		.01									
AL0	ABC	0	001	460	Phei	1	Efflu	0	Base	Q1	Pour	MO	<=	.17	01/3 =		.01									
AL0	ABC	0	001	460	Phei	1	Efflu	0	Base	Q1	Pour	MO	<=	.17	02/2 =		###									
AL0	ABC	0	001	460	Phei	1	Efflu	0	Base	Q1	Pour	MO	<=	.17	03/3 =		###									
AL0	ABC	0	001	460	Phei	1	Efflu	0	Base	Q1	Pour	MO	<=	.17	04/3 =		###									
AL0	ABC	0	001	460	Phei	1	Efflu	0	Base	Q1	Pour	MO	<=	.17	05/3 =											
AL0	ABC	0	001	460	Phei	1	Efflu	0	Base	Q1	Pour	MO	<=	.17	06/3 =		###									
AL0	ABC	0	001	460	Phei	1	Efflu	0	Base	Q1	Pour	MO	<=	.17	07/3 =		###									
AL0	ABC	0	001	460	Phei	1	Efflu	0	Base	Q1	Pour	MO	<=	.17	08/3 =		###									
AL0	ABC	0	001	460	Phei	1	Efflu	0	Base	Q1	Pour	MO	<=	.17	09/3 =		###									
AL0	ABC	0	001	460	Phei	1	Efflu	0	Base	Q1	Pour	MO	<=	.17	10/3 =		.01									
AL0	ABC	0	001	460	Phei	1	Efflu	0	Base	Q1	Pour	MO	<=	.17	11/3 =											
AL0	ABC	0	001	460	Phei	1	Efflu	0	Base	Q1	Pour	MO	<=	.17	12/3 =		###									
AL0	ABC	0	001	460	Phei	1	Efflu	0	Base	Q1	Pour	MO	<=	.17	01/3 =		###									
AL0	ABC	0	001	460	Phei	1	Efflu	0	Base	Q1	Pour	MO	<=	.17	02/2 =		###									
AL0	ABC	0	001	460	Phei	1	Efflu	0	Base	Q1	Pour	MO	<=	.17	03/3 =		###									
AL0	ABC	0	001	460	Phei	1	Efflu	0	Base	Q1	Pour	MO	<=	.17	04/3 =				D90		N		Non	6/28	2	RE - 7/26
AL0	ABC	0	001	460	Phei	1	Efflu	0	Base	Q1	Pour	MO	<=	.17	05/3 =		###									
AL0	ABC	0	001	460	Phei	1	Efflu	0	Base	Q1	Pour	MO	<=	.17	06/3 =		.01									

NPD	Perr	Vers	DSD	Para	Para	Mon	Mon	Lim	Cha	Lim	Lim	Stat	Lim	Lim	Mon	DMF	DMF	NOD	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q1	Pou	MO	<=	.17	07/3 =	.01										
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q1	Pou	MO	<=	.17	08/3 =	.02										
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q1	Pou	MO	<=	.17	09/3 =	.03										
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q1	Pou	MO	<=	.17	10/3 =	###										
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q1	Pou	MO	<=	.17	11/3 =	.01										
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q1	Pou	MO	<=	.17	12/3 =	###										
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	01/3 =				D90		K	Non	3/31	2	RE -	6/23
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	02/2 =	.01			D90		K	Non	4/28	2	RE -	6/23
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	03/3 =	.01										
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	04/3 =	.02										
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	05/3 =	.01										
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	06/3 =	.02										
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	07/3 =											
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	08/3 =	.01										
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	09/3 =	.01										
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	10/3 =	.01										
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	11/3 =	.01										
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	12/3 =	.02										
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	01/3 =	.01										
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	02/2 =	.02										
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	03/3 =	.03										
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	04/3 =	.01										
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	05/3 =											
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	06/3 =	.01										
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	07/3 =	.01										
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	08/3 =	###										
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	09/3 =	.01										
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	10/3 =	.01										
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	11/3 =											
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	12/3 =	.01										
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	01/3 =	###										
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	02/2 =	###										
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	03/3 =	###										
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	04/3 =				D90		K	Non	6/28	2	RE -	7/26
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	05/3 =	.02										
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	06/3 =	.01										
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	07/3 =	.01										
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	08/3 =	.02										
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	09/3 =	.04										
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	10/3 =	.01										
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	11/3 =	.02										
AL0	ABC	0	001	460	Phe	1	Efflu	0	Base	Q2	Pou	DAll	<=	.3	12/3 =	.02										

NPD	Perr	Vers	DSE	Para	Para	Mon	Mon	Lim	Cha	Lim	Lim	Stat	Lim	Lim	Mon	DMF	DMF	NOE	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			01/3 =	###			D80		N	Non	3/31	2	RE - 6/23	
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			02/2 =	###			D80		N	Non	4/28	2	RE - 6/23	
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			03/3 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			04/3 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			05/3 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			06/3 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			07/3 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			08/3 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			09/3 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			10/3 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			11/3 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			12/3 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			01/3 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			02/2 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			03/3 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			04/3 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			05/3 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			06/3 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			07/3 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			08/3 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			09/3 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			10/3 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			11/3 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			12/3 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			01/3 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			02/2 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			03/3 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			04/3 =	###			D80		N	Non	6/28	2	RE - 7/26	
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			05/3 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			06/3 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			07/3 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			08/3 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			09/3 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			10/3 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			11/3 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			12/3 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAll			01/3 =	###			D80		K	Non	3/31	2	RE - 6/23	
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAll			02/2 =	###			D80		K	Non	4/28	2	RE - 6/23	
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAll			03/3 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAll			04/3 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAll			05/3 =	###										
AL0	ABC	0	001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAll			06/3 =	###										

NPC	Perr	Vers	DSC	Para	Para	Mon	Mon	Lim	Cha	Lim	Lim	Stat	Lim	Lim	Mon	DMF	DMF	NOI	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC		0 001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIL			07/3 =	###										
AL0	ABC		0 001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIL			08/3 =	###										
AL0	ABC		0 001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIL			09/3 =	###										
AL0	ABC		0 001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIL			10/3 =	###										
AL0	ABC		0 001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIL			11/3 =	###										
AL0	ABC		0 001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIL			12/3 =	###										
AL0	ABC		0 001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIL			01/3 =	###										
AL0	ABC		0 001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIL			02/2 =	###										
AL0	ABC		0 001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIL			03/3 =	###										
AL0	ABC		0 001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIL			04/3 =	###										
AL0	ABC		0 001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIL			05/3 =	###										
AL0	ABC		0 001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIL			06/3 =	###										
AL0	ABC		0 001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIL			07/3 =	###										
AL0	ABC		0 001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIL			08/3 =	###										
AL0	ABC		0 001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIL			09/3 =	###										
AL0	ABC		0 001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIL			10/3 =	###										
AL0	ABC		0 001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIL			11/3 =	###										
AL0	ABC		0 001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIL			12/3 =	###										
AL0	ABC		0 001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIL			01/3 =	###										
AL0	ABC		0 001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIL			02/2 =	###										
AL0	ABC		0 001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIL			03/3 =	###										
AL0	ABC		0 001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIL			04/3 =	###	D80		K	Non	6/28	2	RE - 7/26			
AL0	ABC		0 001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIL			05/3 =	###										
AL0	ABC		0 001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIL			06/3 =	###										
AL0	ABC		0 001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIL			07/3 =	###										
AL0	ABC		0 001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIL			08/3 =	###										
AL0	ABC		0 001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIL			09/3 =	###										
AL0	ABC		0 001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIL			10/3 =	###										
AL0	ABC		0 001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIL			11/3 =	###										
AL0	ABC		0 001	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIL			12/3 =	###										
AL0	ABC		0 001	511	Cyan	1	Efflu	0	Base	Q1	Poun	MO	<=	###	01/3 =	.02	D90		N	Non	3/31	2	RE - 6/23			
AL0	ABC		0 001	511	Cyan	1	Efflu	0	Base	Q1	Poun	MO	<=	###	02/2 =	###	D90		N	Non	4/28	2	RE - 6/23			
AL0	ABC		0 001	511	Cyan	1	Efflu	0	Base	Q1	Poun	MO	<=	###	03/3 =	###										
AL0	ABC		0 001	511	Cyan	1	Efflu	0	Base	Q1	Poun	MO	<=	###	04/3 =	.08										
AL0	ABC		0 001	511	Cyan	1	Efflu	0	Base	Q1	Poun	MO	<=	###	05/3 =	###										
AL0	ABC		0 001	511	Cyan	1	Efflu	0	Base	Q1	Poun	MO	<=	###	06/3 =	.05										
AL0	ABC		0 001	511	Cyan	1	Efflu	0	Base	Q1	Poun	MO	<=	###	07/3 =	###										
AL0	ABC		0 001	511	Cyan	1	Efflu	0	Base	Q1	Poun	MO	<=	###	08/3 =	###										
AL0	ABC		0 001	511	Cyan	1	Efflu	0	Base	Q1	Poun	MO	<=	###	09/3 =	.05										
AL0	ABC		0 001	511	Cyan	1	Efflu	0	Base	Q1	Poun	MO	<=	###	10/3 =	.06										
AL0	ABC		0 001	511	Cyan	1	Efflu	0	Base	Q1	Poun	MO	<=	###	11/3 =	###										
AL0	ABC		0 001	511	Cyan	1	Efflu	0	Base	Q1	Poun	MO	<=	###	12/3 =	###										

NPD	Perr	Vers	DSC	Para	Para	Mon	Mon	Limi	Cha	Lim	Limi	Stat	Limi	Limi	Mon	DMF	DMF	NOI	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q1		Poul	MO	<=	###	01/3 =	###								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q1		Poul	MO	<=	###	02/2 =	.05								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q1		Poul	MO	<=	###	03/3 =	.06								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q1		Poul	MO	<=	###	04/3 =	.08								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q1		Poul	MO	<=	###	05/3 =									
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q1		Poul	MO	<=	###	06/3 =	###								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q1		Poul	MO	<=	###	07/3 =	###								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q1		Poul	MO	<=	###	08/3 =	###								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q1		Poul	MO	<=	###	09/3 =	.04								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q1		Poul	MO	<=	###	10/3 =	.05								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q1		Poul	MO	<=	###	11/3 =	.04								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q1		Poul	MO	<=	###	12/3 =	.06								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q1		Poul	MO	<=	###	01/3 =	.04								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q1		Poul	MO	<=	###	02/2 =	.05								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q1		Poul	MO	<=	###	03/3 =	.05								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q1		Poul	MO	<=	###	04/3 =	.04	D90		N	Non	6/28	2	RE -	7/26
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q1		Poul	MO	<=	###	05/3 =	.06								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q1		Poul	MO	<=	###	06/3 =	###								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q1		Poul	MO	<=	###	07/3 =	###								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q1		Poul	MO	<=	###	08/3 =	###								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q1		Poul	MO	<=	###	09/3 =	.02								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q1		Poul	MO	<=	###	10/3 =	.07								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q1		Poul	MO	<=	###	11/3 =	.05								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q1		Poul	MO	<=	###	12/3 =	.01								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q2		Poul	DAIl	<=	###	01/3 =	###	D90		K	Non	3/31	2	RE -	6/23
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q2		Poul	DAIl	<=	###	02/2 =	###	D90		K	Non	4/28	2	RE -	6/23
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q2		Poul	DAIl	<=	###	03/3 =	.05								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q2		Poul	DAIl	<=	###	04/3 =	.09								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q2		Poul	DAIl	<=	###	05/3 =	###								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q2		Poul	DAIl	<=	###	06/3 =	.07								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q2		Poul	DAIl	<=	###	07/3 =	.11								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q2		Poul	DAIl	<=	###	08/3 =	###								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q2		Poul	DAIl	<=	###	09/3 =	###								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q2		Poul	DAIl	<=	###	10/3 =	.06								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q2		Poul	DAIl	<=	###	11/3 =	.04								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q2		Poul	DAIl	<=	###	12/3 =	###								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q2		Poul	DAIl	<=	###	01/3 =	###								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q2		Poul	DAIl	<=	###	02/2 =	.07								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q2		Poul	DAIl	<=	###	03/3 =	.07								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q2		Poul	DAIl	<=	###	04/3 =	.09								
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q2		Poul	DAIl	<=	###	05/3 =									
AL0	ABC	0	001	511	Cyar	1		Efflu	0	Base	Q2		Poul	DAIl	<=	###	06/3 =	.04								

NPD	Perr	Vers	DSC	Para	Para	Mon	Mon	Lim	Cha	Lim	Lim	Stat	Lim	Lim	Mon	DMF	DMF	NOI	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	001	511	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	07/3 =	.1										
AL0	ABC	0	001	511	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	08/3 =	.05										
AL0	ABC	0	001	511	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	09/3 =	.05										
AL0	ABC	0	001	511	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	10/3 =	.06										
AL0	ABC	0	001	511	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	11/3 =	.04										
AL0	ABC	0	001	511	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	12/3 =	.06										
AL0	ABC	0	001	511	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	01/3 =	.06										
AL0	ABC	0	001	511	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	02/2 =	.05										
AL0	ABC	0	001	511	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	03/3 =	.05										
AL0	ABC	0	001	511	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	04/3 =	.04	D90	K	Non	6/28	2	RE - 7/26				
AL0	ABC	0	001	511	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	05/3 =	.07										
AL0	ABC	0	001	511	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	06/3 =	###										
AL0	ABC	0	001	511	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	07/3 =	###										
AL0	ABC	0	001	511	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	08/3 =	###										
AL0	ABC	0	001	511	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	09/3 =	.03										
AL0	ABC	0	001	511	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	10/3 =	.07										
AL0	ABC	0	001	511	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	11/3 =	.05										
AL0	ABC	0	001	511	Cyar	1	Efflu	0	Base	Q2	Pour	DAll	<=	###	12/3 =	.03										
AL0	ABC	0	001	614	Toxi	1	Efflu	0	Base	Q2	Pass	DAll	<=		01/3 =		D80	K	Non	3/31	2	RE - 6/23				
AL0	ABC	0	001	614	Toxi	1	Efflu	0	Base	Q2	Pass	DAll	<=		02/2 =		D80	K	Non	4/28	2	RE - 6/23				
AL0	ABC	0	001	614	Toxi	1	Efflu	0	Base	Q2	Pass	DAll	<=		03/3 =											
AL0	ABC	0	001	614	Toxi	1	Efflu	0	Base	Q2	Pass	DAll	<=		04/3 =											
AL0	ABC	0	001	614	Toxi	1	Efflu	0	Base	Q2	Pass	DAll	<=		05/3 =											
AL0	ABC	0	001	614	Toxi	1	Efflu	0	Base	Q2	Pass	DAll	<=		06/3 =											
AL0	ABC	0	001	614	Toxi	1	Efflu	0	Base	Q2	Pass	DAll	<=		07/3 =											
AL0	ABC	0	001	614	Toxi	1	Efflu	0	Base	Q2	Pass	DAll	<=		08/3 =											
AL0	ABC	0	001	614	Toxi	1	Efflu	0	Base	Q2	Pass	DAll	<=		09/3 =											
AL0	ABC	0	001	614	Toxi	1	Efflu	0	Base	Q2	Pass	DAll	<=		10/3 =											
AL0	ABC	0	001	614	Toxi	1	Efflu	0	Base	Q2	Pass	DAll	<=		11/3 =											
AL0	ABC	0	001	614	Toxi	1	Efflu	0	Base	Q2	Pass	DAll	<=		12/3 =											
AL0	ABC	0	001	614	Toxi	1	Efflu	0	Base	Q2	Pass	DAll	<=		01/3 =											
AL0	ABC	0	001	614	Toxi	1	Efflu	0	Base	Q2	Pass	DAll	<=		02/2 =											
AL0	ABC	0	001	614	Toxi	1	Efflu	0	Base	Q2	Pass	DAll	<=		03/3 =											
AL0	ABC	0	001	614	Toxi	1	Efflu	0	Base	Q2	Pass	DAll	<=		04/3 =											
AL0	ABC	0	001	614	Toxi	1	Efflu	0	Base	Q2	Pass	DAll	<=		05/3 =											
AL0	ABC	0	001	614	Toxi	1	Efflu	0	Base	Q2	Pass	DAll	<=		06/3 =											
AL0	ABC	0	001	614	Toxi	1	Efflu	0	Base	Q2	Pass	DAll	<=		07/3 =											
AL0	ABC	0	001	614	Toxi	1	Efflu	0	Base	Q2	Pass	DAll	<=		08/3 =											
AL0	ABC	0	001	614	Toxi	1	Efflu	0	Base	Q2	Pass	DAll	<=		09/3 =											
AL0	ABC	0	001	614	Toxi	1	Efflu	0	Base	Q2	Pass	DAll	<=		10/3 =											
AL0	ABC	0	001	614	Toxi	1	Efflu	0	Base	Q2	Pass	DAll	<=		11/3 =											
AL0	ABC	0	001	614	Toxi	1	Efflu	0	Base	Q2	Pass	DAll	<=		12/3 =											

NPD	Perr	Vers	DSD	Para	Para	Mon	Mon	Limi	Cha	Lim	Limi	Stat	Limi	Lim	Mon	DMF	DMF	NOD	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		01/3 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		02/2 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		03/3 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		04/3 =			D80	K	Non	6/28	2		RE - 7/26
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		05/3 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		06/3 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		07/3 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		08/3 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		09/3 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		10/3 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		11/3 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		12/3 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		01/3 =			D80	K	Non	3/31	2		RE - 6/23
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		02/2 =			D80	K	Non	4/28	2		RE - 6/23
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		03/3 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		04/3 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		05/3 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		06/3 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		07/3 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		08/3 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		09/3 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		10/3 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		11/3 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		12/3 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		01/3 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		02/2 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		03/3 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		04/3 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		05/3 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		06/3 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		07/3 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		08/3 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		09/3 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		10/3 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		11/3 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		12/3 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		01/3 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		02/2 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		03/3 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		04/3 =			D80	K	Non	6/28	2		RE - 7/26
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		05/3 =									
AL0	ABC		0	001	614	Toxi	1		Efflu	0	Base	Q2	Pass	DAll	<=		06/3 =									

NPC	Perr	Vers	DSC	Para	Para	Mon	Mon	Lim	Cha	Lim	Lim	Stat	Lim	Lim	Mon	DMF	DMF	NOL	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC		0 001	614	Toxi	1	Efflu	0	Base	Q2	Pas	DAll	<=		07/3 =											
AL0	ABC		0 001	614	Toxi	1	Efflu	0	Base	Q2	Pas	DAll	<=		08/3 =											
AL0	ABC		0 001	614	Toxi	1	Efflu	0	Base	Q2	Pas	DAll	<=		09/3 =											
AL0	ABC		0 001	614	Toxi	1	Efflu	0	Base	Q2	Pas	DAll	<=		10/3 =											
AL0	ABC		0 001	614	Toxi	1	Efflu	0	Base	Q2	Pas	DAll	<=		11/3 =											
AL0	ABC		0 001	614	Toxi	1	Efflu	0	Base	Q2	Pas	DAll	<=		12/3 =											
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q1	Pou	MO	<=	33	05/3 =	.7										
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q1	Pou	MO	<=	33	06/3 =	.8										
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q1	Pou	MO	<=	33	07/3 =	.9										
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q1	Pou	MO	<=	33	08/3 =	1.1										
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q1	Pou	MO	<=	33	09/3 =	8.8										
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q1	Pou	MO	<=	33	10/3 =	1.1										
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q1	Pou	MO	<=	33	11/3 =	.9										
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q1	Pou	MO	<=	33	05/3 =	.8										
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q1	Pou	MO	<=	33	06/3 =	.9										
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q1	Pou	MO	<=	33	07/3 =	1.4										
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q1	Pou	MO	<=	33	08/3 =	.9										
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q1	Pou	MO	<=	33	09/3 =	.9										
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q1	Pou	MO	<=	33	10/3 =	1.1										
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q1	Pou	MO	<=	33	11/3 =	.9										
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q1	Pou	MO	<=	33	05/3 =	5.9										
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q1	Pou	MO	<=	33	06/3 =	.8										
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q1	Pou	MO	<=	33	07/3 =	.8										
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q1	Pou	MO	<=	33	08/3 =	.9										
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q1	Pou	MO	<=	33	09/3 =	.9										
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q1	Pou	MO	<=	33	10/3 =	.8										
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q1	Pou	MO	<=	33	11/3 =	.9										
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q2	Pou	DAll	<=	###	05/3 =	.9										
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q2	Pou	DAll	<=	###	06/3 =	1.6										
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q2	Pou	DAll	<=	###	07/3 =	1.3										
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q2	Pou	DAll	<=	###	08/3 =	1.4										
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q2	Pou	DAll	<=	###	09/3 =	###										
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q2	Pou	DAll	<=	###	10/3 =	2.3										
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q2	Pou	DAll	<=	###	11/3 =	1.2										
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q2	Pou	DAll	<=	###	05/3 =	.9										
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q2	Pou	DAll	<=	###	06/3 =	1.1										
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q2	Pou	DAll	<=	###	07/3 =	1.7										
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q2	Pou	DAll	<=	###	08/3 =	1.2										
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q2	Pou	DAll	<=	###	09/3 =	1.1										
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q2	Pou	DAll	<=	###	10/3 =	1.3										
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q2	Pou	DAll	<=	###	11/3 =	1.1										
AL0	ABC		0 001	615	Amn	1	Efflu	0	Base	Q2	Pou	DAll	<=	###	05/3 =	###										

NPD	Perr	Vers	DSD	Para	Para	Mon	Mon	Lim	Cha	Lim	Lim	Stat	Lim	Lim	Mon	DMF	DMF	NOD	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	001	615	Amn	1	Efflu	0	Base	Q2	Pour	DAIl	<=	###	06/3 =	.9										
AL0	ABC	0	001	615	Amn	1	Efflu	0	Base	Q2	Pour	DAIl	<=	###	07/3 =	1										
AL0	ABC	0	001	615	Amn	1	Efflu	0	Base	Q2	Pour	DAIl	<=	###	08/3 =	1.1										
AL0	ABC	0	001	615	Amn	1	Efflu	0	Base	Q2	Pour	DAIl	<=	###	09/3 =	1										
AL0	ABC	0	001	615	Amn	1	Efflu	0	Base	Q2	Pour	DAIl	<=	###	10/3 =	.9										
AL0	ABC	0	001	615	Amn	1	Efflu	0	Base	Q2	Pour	DAIl	<=	###	11/3 =	1.2										
AL0	ABC	0	001	615	Amn	1	Efflu	1	Base	Q1	Pour	MO	<=	###	01/3 =	###	D90	59	N		Non	3/31	2		RE - 6/23	
AL0	ABC	0	001	615	Amn	1	Efflu	1	Base	Q1	Pour	MO	<=	###	01/3 =	###	E90	59								
AL0	ABC	0	001	615	Amn	1	Efflu	1	Base	Q1	Pour	MO	<=	###	02/2 =	.4	D90		N		Non	4/28	2		RE - 6/23	
AL0	ABC	0	001	615	Amn	1	Efflu	1	Base	Q1	Pour	MO	<=	###	03/3 =	.5										
AL0	ABC	0	001	615	Amn	1	Efflu	1	Base	Q1	Pour	MO	<=	###	04/3 =	.9										
AL0	ABC	0	001	615	Amn	1	Efflu	1	Base	Q1	Pour	MO	<=	###	12/3 =	5.5										
AL0	ABC	0	001	615	Amn	1	Efflu	1	Base	Q1	Pour	MO	<=	###	01/3 =	.7										
AL0	ABC	0	001	615	Amn	1	Efflu	1	Base	Q1	Pour	MO	<=	###	02/2 =	1.7										
AL0	ABC	0	001	615	Amn	1	Efflu	1	Base	Q1	Pour	MO	<=	###	03/3 =	1.3										
AL0	ABC	0	001	615	Amn	1	Efflu	1	Base	Q1	Pour	MO	<=	###	04/3 =	.5										
AL0	ABC	0	001	615	Amn	1	Efflu	1	Base	Q1	Pour	MO	<=	###	12/3 =	1.2										
AL0	ABC	0	001	615	Amn	1	Efflu	1	Base	Q1	Pour	MO	<=	###	01/3 =	.8										
AL0	ABC	0	001	615	Amn	1	Efflu	1	Base	Q1	Pour	MO	<=	###	02/2 =	.8										
AL0	ABC	0	001	615	Amn	1	Efflu	1	Base	Q1	Pour	MO	<=	###	03/3 =	1.1										
AL0	ABC	0	001	615	Amn	1	Efflu	1	Base	Q1	Pour	MO	<=	###	04/3 =	.9	D90		N		Non	6/28	2		RE - 7/26	
AL0	ABC	0	001	615	Amn	1	Efflu	1	Base	Q1	Pour	MO	<=	###	12/3 =	.7										
AL0	ABC	0	001	615	Amn	1	Efflu	1	Base	Q2	Pour	DAIl	<=	###	01/3 =	###	D90	0	K		Non	3/31	2		RE - 6/23	
AL0	ABC	0	001	615	Amn	1	Efflu	1	Base	Q2	Pour	DAIl	<=	###	01/3 =	###	E90	0								
AL0	ABC	0	001	615	Amn	1	Efflu	1	Base	Q2	Pour	DAIl	<=	###	02/2 =	.5	D90		K		Non	4/28	2		RE - 6/23	
AL0	ABC	0	001	615	Amn	1	Efflu	1	Base	Q2	Pour	DAIl	<=	###	03/3 =	.7										
AL0	ABC	0	001	615	Amn	1	Efflu	1	Base	Q2	Pour	DAIl	<=	###	04/3 =	1.4										
AL0	ABC	0	001	615	Amn	1	Efflu	1	Base	Q2	Pour	DAIl	<=	###	12/3 =	23										
AL0	ABC	0	001	615	Amn	1	Efflu	1	Base	Q2	Pour	DAIl	<=	###	01/3 =	1										
AL0	ABC	0	001	615	Amn	1	Efflu	1	Base	Q2	Pour	DAIl	<=	###	02/2 =	2.9										
AL0	ABC	0	001	615	Amn	1	Efflu	1	Base	Q2	Pour	DAIl	<=	###	03/3 =	1.7										
AL0	ABC	0	001	615	Amn	1	Efflu	1	Base	Q2	Pour	DAIl	<=	###	04/3 =	.8										
AL0	ABC	0	001	615	Amn	1	Efflu	1	Base	Q2	Pour	DAIl	<=	###	12/3 =	1.5										
AL0	ABC	0	001	615	Amn	1	Efflu	1	Base	Q2	Pour	DAIl	<=	###	01/3 =	.9										
AL0	ABC	0	001	615	Amn	1	Efflu	1	Base	Q2	Pour	DAIl	<=	###	02/2 =	1.1										
AL0	ABC	0	001	615	Amn	1	Efflu	1	Base	Q2	Pour	DAIl	<=	###	03/3 =	1.6										
AL0	ABC	0	001	615	Amn	1	Efflu	1	Base	Q2	Pour	DAIl	<=	###	04/3 =	1.2	D90		K		Non	6/28	2		RE - 7/26	
AL0	ABC	0	001	615	Amn	1	Efflu	1	Base	Q2	Pour	DAIl	<=	###	12/3 =	.8										
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			01/3 =	###	D80		K		Non	3/31	2		RE - 6/23	
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			02/2 =	###	D80		K		Non	4/28	2		RE - 6/23	
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			03/3 =	###										
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			04/3 =	###										

NPC	Perr	Vers	DSC	Para	Para	Mon	Mon	Limi	Cha	Lim	Lim	Stat	Lim	Lim	Mon	DMF	DMF	NOC	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			05/3 =		###									
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			06/3 =		###									
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			07/3 =		###									
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			08/3 =		###									
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			09/3 =		###									
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			10/3 =		###									
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			11/3 =		###									
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			12/3 =		###									
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			01/3 =		###									
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			02/2 =		###									
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			03/3 =		###									
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			04/3 =		###									
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			05/3 =		###									
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			06/3 =		###									
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			07/3 =		###									
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			08/3 =		###									
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			09/3 =		###									
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			10/3 =		###									
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			11/3 =		###									
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			12/3 =		###									
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			01/3 =		###									
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			02/2 =		###									
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			03/3 =		###									
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			04/3 =		###	D80		K	Non	6/28	2		RE - 7/26		
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			05/3 =		###									
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			06/3 =		###									
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			07/3 =		###									
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			08/3 =		###									
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			09/3 =		###									
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			10/3 =		###									
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			11/3 =		###									
AL0	ABC	0	001	702	Solic	1	Efflu	0	Base	Q2	Pour	DAIl			12/3 =		###									
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q1	Pour	MO	<=	56	05/3 =		5.5									
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q1	Pour	MO	<=	56	06/3 =		7.6									
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q1	Pour	MO	<=	56	07/3 =		5.9									
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q1	Pour	MO	<=	56	08/3 =		4.5									
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q1	Pour	MO	<=	56	09/3 =		5.4									
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q1	Pour	MO	<=	56	10/3 =		5.5									
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q1	Pour	MO	<=	56	11/3 =											
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q1	Pour	MO	<=	56	05/3 =		6.8									
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q1	Pour	MO	<=	56	06/3 =		7.8									
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q1	Pour	MO	<=	56	07/3 =		5.8									

NPD	Perr	Vers	DSD	Para	Para	Mon	Mon	Lim	Cha	Lim	Lim	Stat	Lim	Lim	Mon	DMF	DMF	NOD	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q1	Pour	MO	<=	56	08/3 =	6										
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q1	Pour	MO	<=	56	09/3 =	5.3										
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q1	Pour	MO	<=	56	10/3 =	5.8										
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q1	Pour	MO	<=	56	11/3 =	4.4										
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q1	Pour	MO	<=	56	05/3 =	7.2										
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q1	Pour	MO	<=	56	06/3 =	3.8										
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q1	Pour	MO	<=	56	07/3 =	4.5										
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q1	Pour	MO	<=	56	08/3 =	4.2										
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q1	Pour	MO	<=	56	09/3 =	3										
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q1	Pour	MO	<=	56	10/3 =	4.6										
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q1	Pour	MO	<=	56	11/3 =	5										
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q2	Pour	DAIl	<=	84	05/3 =	9										
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q2	Pour	DAIl	<=	84	06/3 =	12										
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q2	Pour	DAIl	<=	84	07/3 =	7.5										
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q2	Pour	DAIl	<=	84	08/3 =	6										
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q2	Pour	DAIl	<=	84	09/3 =	10										
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q2	Pour	DAIl	<=	84	10/3 =	6										
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q2	Pour	DAIl	<=	84	11/3 =											
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q2	Pour	DAIl	<=	84	05/3 =	10										
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q2	Pour	DAIl	<=	84	06/3 =	12										
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q2	Pour	DAIl	<=	84	07/3 =	7										
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q2	Pour	DAIl	<=	84	08/3 =	9										
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q2	Pour	DAIl	<=	84	09/3 =	8										
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q2	Pour	DAIl	<=	84	10/3 =	7										
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q2	Pour	DAIl	<=	84	11/3 =	7										
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q2	Pour	DAIl	<=	84	05/3 =	10										
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q2	Pour	DAIl	<=	84	06/3 =	4.4										
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q2	Pour	DAIl	<=	84	07/3 =	6										
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q2	Pour	DAIl	<=	84	08/3 =	6										
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q2	Pour	DAIl	<=	84	09/3 =	5										
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q2	Pour	DAIl	<=	84	10/3 =	5										
AL0	ABC	0	001	800	BOD	1	Efflu	0	Base	Q2	Pour	DAIl	<=	84	11/3 =	6										
AL0	ABC	0	001	800	BOD	1	Efflu	1	Base	Q1	Pour	MO	<=	213	01/3 =	3.8	D90		N	Non	3/31	2	RE - 6/23			
AL0	ABC	0	001	800	BOD	1	Efflu	1	Base	Q1	Pour	MO	<=	213	02/2 =	3.5	D90		N	Non	4/28	2	RE - 6/23			
AL0	ABC	0	001	800	BOD	1	Efflu	1	Base	Q1	Pour	MO	<=	213	03/3 =	3.8										
AL0	ABC	0	001	800	BOD	1	Efflu	1	Base	Q1	Pour	MO	<=	213	04/3 =	5										
AL0	ABC	0	001	800	BOD	1	Efflu	1	Base	Q1	Pour	MO	<=	213	12/3 =											
AL0	ABC	0	001	800	BOD	1	Efflu	1	Base	Q1	Pour	MO	<=	213	01/3 =	2.1										
AL0	ABC	0	001	800	BOD	1	Efflu	1	Base	Q1	Pour	MO	<=	213	02/2 =	6.3										
AL0	ABC	0	001	800	BOD	1	Efflu	1	Base	Q1	Pour	MO	<=	213	03/3 =	7.2										
AL0	ABC	0	001	800	BOD	1	Efflu	1	Base	Q1	Pour	MO	<=	213	04/3 =	4.3										
AL0	ABC	0	001	800	BOD	1	Efflu	1	Base	Q1	Pour	MO	<=	213	12/3 =	6										

NPD	Perr	Vers	DSE	Para	Para	Mon	Mon	Lim	Cha	Lim	Lim	Stat	Lim	Lim	Mon	DMF	DMF	NOE	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	001	800	BOD	1	Efflu	1	Base	Q1	Poul	MO	<=	213	01/3 =	6.3										
AL0	ABC	0	001	800	BOD	1	Efflu	1	Base	Q1	Poul	MO	<=	213	02/2 =	4.6										
AL0	ABC	0	001	800	BOD	1	Efflu	1	Base	Q1	Poul	MO	<=	213	03/3 =	2.8										
AL0	ABC	0	001	800	BOD	1	Efflu	1	Base	Q1	Poul	MO	<=	213	04/3 =	6.5	D90		N		Non	6/28	2		RE - 7/26	
AL0	ABC	0	001	800	BOD	1	Efflu	1	Base	Q1	Poul	MO	<=	213	12/3 =	4.5										
AL0	ABC	0	001	800	BOD	1	Efflu	1	Base	Q2	Poul	DAIl	<=	320	01/3 =	7	D90		K		Non	3/31	2		RE - 6/23	
AL0	ABC	0	001	800	BOD	1	Efflu	1	Base	Q2	Poul	DAIl	<=	320	02/2 =	6	D90		K		Non	4/28	2		RE - 6/23	
AL0	ABC	0	001	800	BOD	1	Efflu	1	Base	Q2	Poul	DAIl	<=	320	03/3 =	6										
AL0	ABC	0	001	800	BOD	1	Efflu	1	Base	Q2	Poul	DAIl	<=	320	04/3 =	10										
AL0	ABC	0	001	800	BOD	1	Efflu	1	Base	Q2	Poul	DAIl	<=	320	12/3 =											
AL0	ABC	0	001	800	BOD	1	Efflu	1	Base	Q2	Poul	DAIl	<=	320	01/3 =	8.3										
AL0	ABC	0	001	800	BOD	1	Efflu	1	Base	Q2	Poul	DAIl	<=	320	02/2 =	10										
AL0	ABC	0	001	800	BOD	1	Efflu	1	Base	Q2	Poul	DAIl	<=	320	03/3 =	9										
AL0	ABC	0	001	800	BOD	1	Efflu	1	Base	Q2	Poul	DAIl	<=	320	04/3 =	7										
AL0	ABC	0	001	800	BOD	1	Efflu	1	Base	Q2	Poul	DAIl	<=	320	12/3 =	9										
AL0	ABC	0	001	800	BOD	1	Efflu	1	Base	Q2	Poul	DAIl	<=	320	01/3 =	9										
AL0	ABC	0	001	800	BOD	1	Efflu	1	Base	Q2	Poul	DAIl	<=	320	02/2 =	7										
AL0	ABC	0	001	800	BOD	1	Efflu	1	Base	Q2	Poul	DAIl	<=	320	03/3 =	6										
AL0	ABC	0	001	800	BOD	1	Efflu	1	Base	Q2	Poul	DAIl	<=	320	04/3 =	8	D90		K		Non	6/28	2		RE - 7/26	
AL0	ABC	0	001	800	BOD	1	Efflu	1	Base	Q2	Poul	DAIl	<=	320	12/3 =	5										
AL0	ABC	0	001	006	Nitri	1	Efflu	0	Base	Q2	Poul	DAIl			03/3 =											
AL0	ABC	0	001	006	Nitri	1	Efflu	0	Base	Q2	Poul	DAIl			06/3 =											
AL0	ABC	0	001	006	Nitri	1	Efflu	0	Base	Q2	Poul	DAIl			09/3 =	###										
AL0	ABC	0	001	006	Nitri	1	Efflu	0	Base	Q2	Poul	DAIl			12/3 =	###										
AL0	ABC	0	001	006	Nitri	1	Efflu	0	Base	Q2	Poul	DAIl			03/3 =	###										
AL0	ABC	0	001	006	Nitri	1	Efflu	0	Base	Q2	Poul	DAIl			06/3 =	###										
AL0	ABC	0	001	006	Nitri	1	Efflu	0	Base	Q2	Poul	DAIl			09/3 =	###										
AL0	ABC	0	001	006	Nitri	1	Efflu	0	Base	Q2	Poul	DAIl			12/3 =	###										
AL0	ABC	0	001	006	Nitri	1	Efflu	0	Base	Q2	Poul	DAIl			03/3 =	###										
AL0	ABC	0	001	006	Nitri	1	Efflu	0	Base	Q2	Poul	DAIl			06/3 =	###										
AL0	ABC	0	001	006	Nitri	1	Efflu	0	Base	Q2	Poul	DAIl			09/3 =	###										
AL0	ABC	0	001	006	Nitri	1	Efflu	0	Base	Q2	Poul	DAIl			12/3 =	###										
AL0	ABC	0	001	006	Phos	1	Efflu	0	Base	Q2	Poul	DAIl			03/3 =											
AL0	ABC	0	001	006	Phos	1	Efflu	0	Base	Q2	Poul	DAIl			06/3 =											
AL0	ABC	0	001	006	Phos	1	Efflu	0	Base	Q2	Poul	DAIl			09/3 =	.3										
AL0	ABC	0	001	006	Phos	1	Efflu	0	Base	Q2	Poul	DAIl			12/3 =											
AL0	ABC	0	001	006	Phos	1	Efflu	0	Base	Q2	Poul	DAIl			03/3 =	.3										
AL0	ABC	0	001	006	Phos	1	Efflu	0	Base	Q2	Poul	DAIl			06/3 =											
AL0	ABC	0	001	006	Phos	1	Efflu	0	Base	Q2	Poul	DAIl			09/3 =											
AL0	ABC	0	001	006	Phos	1	Efflu	0	Base	Q2	Poul	DAIl			12/3 =	.2										
AL0	ABC	0	001	006	Phos	1	Efflu	0	Base	Q2	Poul	DAIl			03/3 =	.3										
AL0	ABC	0	001	006	Phos	1	Efflu	0	Base	Q2	Poul	DAIl			06/3	B										

NPC	Perr	Vers	DSC	Para	Para	Mon	Mon	Limi	Cha	Lim	Limi	Stat	Lim	Lim	Mon	DMF	DMF	NOC	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	001	006	Pho	1	Efflu	0	Base	Q2	Pou	DAIl			09/3			B								
AL0	ABC	0	001	006	Pho	1	Efflu	0	Base	Q2	Pou	DAIl			12/3			B								
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	01/3 =		7.3		D90							
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	02/2 =		###		D90							
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	03/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	04/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	05/3 =		7.1									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	06/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	07/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	08/3 =		7.4									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	09/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	10/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	11/3 =		7.3									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	12/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	01/3 =		7.8									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	02/2 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	03/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	04/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	05/3 =		7.6									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	06/3 =		6.9									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	07/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	08/3 =		7.5									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	09/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	10/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	11/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	12/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	01/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	02/2 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	03/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	04/3 =		###		D90							
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	05/3 =		8.2									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	06/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	07/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	08/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	09/3 =		7.9									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	10/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	11/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C1	Star	DAIl	>=	6	12/3 =		7.1									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAIl	<=	8.5	01/3 =		8.3		D90		K	Non	3/31	2		RE - 6/23
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAIl	<=	8.5	02/2 =		7.9		D90		K	Non	4/28	2		RE - 6/23
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAIl	<=	8.5	03/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAIl	<=	8.5	04/3 =		###									

NPC	Perr	Vers	DSC	Para	Para	Mon	Mon	Limi	Cha	Lim	Limi	Stat	Limi	Lim	Mon	DMF	DMF	NOL	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	8.5	05/3 =		7.8									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	8.5	06/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	8.5	07/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	8.5	08/3 =		8.4									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	8.5	09/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	8.5	10/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	8.5	11/3 =		7.9									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	8.5	12/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	8.5	01/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	8.5	02/2 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	8.5	03/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	8.5	04/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	8.5	05/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	8.5	06/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	8.5	07/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	8.5	08/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	8.5	09/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	8.5	10/3 =		8.4									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	8.5	11/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	8.5	12/3 =		7.3									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	8.5	01/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	8.5	02/2 =		7.8									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	8.5	03/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	8.5	04/3 =		###		D90		K		Non	6/28	2	RE - 7/26
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	8.5	05/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	8.5	06/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	8.5	07/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	8.5	08/3 =		7.5									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	8.5	09/3 =		8.3									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	8.5	10/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	8.5	11/3 =		###									
AL0	ABC	0	002	004	pH	1	Efflu	0	Base	C3	Star	DAll	<=	8.5	12/3 =		###									
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	01/3 =		###		D90		N		Non	3/31	2	RE - 6/23
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	02/2 =		###		D90		N		Non	4/28	2	RE - 6/23
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	03/3 =		###									
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	04/3 =		###									
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	05/3 =		11									
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	06/3 =		21									
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	07/3 =		5.5									
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	08/3 =		###									
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	09/3 =		9									
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	10/3 =		6.9									

NPD	Perr	Vers	DSD	Para	Para	Mon	Mon	Lim	Cha	Lim	Lim	Stat	Lim	Lim	Mon	DMF	DMF	NOD	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	11/3 =	6.1										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	12/3 =	###										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	01/3 =	###										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	02/2 =	###										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	03/3 =	###										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	04/3 =	###										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	05/3 =	###										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	06/3 =	###										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	07/3 =	###										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	08/3 =	6.5										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	09/3 =	###										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	10/3 =	###										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	11/3 =	7										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	12/3 =	###										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	01/3 =	###										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	02/2 =	16										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	03/3 =	16										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	04/3 =	###	D90		N	Non	6/28	2	RE - 7/26			
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	05/3 =	###										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	06/3 =	###										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	07/3 =	###										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	08/3 =	23										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	09/3 =	16										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	10/3 =	###										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	11/3 =	###										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C2	Milli	MO	<=	35	12/3 =	###										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAIl	<=	70	01/3 =	48	D90		K	Non	3/31	2	RE - 6/23			
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAIl	<=	70	02/2 =	68	D90		K	Non	4/28	2	RE - 6/23			
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAIl	<=	70	03/3 =	26										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAIl	<=	70	04/3 =	40										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAIl	<=	70	05/3 =	17										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAIl	<=	70	06/3 =	36										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAIl	<=	70	07/3 =	6.5										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAIl	<=	70	08/3 =	14										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAIl	<=	70	09/3 =	11										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAIl	<=	70	10/3 =	9.5										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAIl	<=	70	11/3 =	###										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAIl	<=	70	12/3 =	18										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAIl	<=	70	01/3 =	54										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAIl	<=	70	02/2 =	14										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAIl	<=	70	03/3 =	46										
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAIl	<=	70	04/3 =	28										

NPD	Perr	Vers	DSD	Para	Para	Mon	Mon	Lim	Cha	Lim	Lim	Stat	Lim	Lim	Mon	DMF	DMF	NOD	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAll	<=	70	05/3 =		15									
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAll	<=	70	06/3 =		17									
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAll	<=	70	07/3 =		32									
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAll	<=	70	08/3 =		11									
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAll	<=	70	09/3 =		23									
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAll	<=	70	10/3 =		16									
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAll	<=	70	11/3 =		14									
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAll	<=	70	12/3 =		40									
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAll	<=	70	01/3 =		35									
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAll	<=	70	02/2 =		20									
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAll	<=	70	03/3 =		27									
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAll	<=	70	04/3 =		16	D90		K	Non	6/28	2		RE - 7/26	
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAll	<=	70	05/3 =		32									
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAll	<=	70	06/3 =		21									
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAll	<=	70	07/3 =		21									
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAll	<=	70	08/3 =		49									
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAll	<=	70	09/3 =		26									
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAll	<=	70	10/3 =		18									
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAll	<=	70	11/3 =		22									
AL0	ABC	0	002	005	Solic	1	Efflu	0	Base	C3	Milli	DAll	<=	70	12/3 =		13									
AL0	ABC	0	002	007	Cyan	1	Efflu	0	Base	Q2	Pour	DAll			01/3 =			D80		K	Non	3/31	2		RE - 6/23	
AL0	ABC	0	002	007	Cyan	1	Efflu	0	Base	Q2	Pour	DAll			02/2 =			D80		K	Non	4/28	2		RE - 6/23	
AL0	ABC	0	002	007	Cyan	1	Efflu	0	Base	Q2	Pour	DAll			03/3 =											
AL0	ABC	0	002	007	Cyan	1	Efflu	0	Base	Q2	Pour	DAll			04/3 =											
AL0	ABC	0	002	007	Cyan	1	Efflu	0	Base	Q2	Pour	DAll			05/3 =											
AL0	ABC	0	002	007	Cyan	1	Efflu	0	Base	Q2	Pour	DAll			06/3 =											
AL0	ABC	0	002	007	Cyan	1	Efflu	0	Base	Q2	Pour	DAll			07/3 =											
AL0	ABC	0	002	007	Cyan	1	Efflu	0	Base	Q2	Pour	DAll			08/3 =											
AL0	ABC	0	002	007	Cyan	1	Efflu	0	Base	Q2	Pour	DAll			09/3 =											
AL0	ABC	0	002	007	Cyan	1	Efflu	0	Base	Q2	Pour	DAll			10/3 =											
AL0	ABC	0	002	007	Cyan	1	Efflu	0	Base	Q2	Pour	DAll			11/3 =											
AL0	ABC	0	002	007	Cyan	1	Efflu	0	Base	Q2	Pour	DAll			12/3 =											
AL0	ABC	0	002	007	Cyan	1	Efflu	0	Base	Q2	Pour	DAll			01/3 =											
AL0	ABC	0	002	007	Cyan	1	Efflu	0	Base	Q2	Pour	DAll			02/2 =											
AL0	ABC	0	002	007	Cyan	1	Efflu	0	Base	Q2	Pour	DAll			03/3 =											
AL0	ABC	0	002	007	Cyan	1	Efflu	0	Base	Q2	Pour	DAll			04/3 =											
AL0	ABC	0	002	007	Cyan	1	Efflu	0	Base	Q2	Pour	DAll			05/3 =											
AL0	ABC	0	002	007	Cyan	1	Efflu	0	Base	Q2	Pour	DAll			06/3 =											
AL0	ABC	0	002	007	Cyan	1	Efflu	0	Base	Q2	Pour	DAll			07/3 =											
AL0	ABC	0	002	007	Cyan	1	Efflu	0	Base	Q2	Pour	DAll			08/3 =											
AL0	ABC	0	002	007	Cyan	1	Efflu	0	Base	Q2	Pour	DAll			09/3 =											
AL0	ABC	0	002	007	Cyan	1	Efflu	0	Base	Q2	Pour	DAll			10/3 =											

NPD	Perr	Vers	DSD	Para	Para	Mon	Mon	Limi	Cha	Lim	Limi	Stat	Limi	Limi	Mon	DMR	DMR	NOD	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	002	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAIl		11/3 =												
AL0	ABC	0	002	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAIl		12/3 =												
AL0	ABC	0	002	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAIl		01/3 =												
AL0	ABC	0	002	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAIl		02/2 =												
AL0	ABC	0	002	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAIl		03/3 =												
AL0	ABC	0	002	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAIl		04/3 =				D80		K	Non	6/28	2	RE -	7/26	
AL0	ABC	0	002	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAIl		05/3 =												
AL0	ABC	0	002	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAIl		06/3 =												
AL0	ABC	0	002	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAIl		07/3 =												
AL0	ABC	0	002	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAIl		08/3 =												
AL0	ABC	0	002	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAIl		09/3 =												
AL0	ABC	0	002	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAIl		10/3 =												
AL0	ABC	0	002	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAIl		11/3 =												
AL0	ABC	0	002	007	Cyar	1	Efflu	0	Base	Q2	Pour	DAIl		12/3 =												
AL0	ABC	0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=	3	01/3 =	1.4		D90		N	Non	3/31	2	RE -	6/23	
AL0	ABC	0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=	3	02/2 =	.69		D90		N	Non	4/28	2	RE -	6/23	
AL0	ABC	0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=	3	03/3 =	###										
AL0	ABC	0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=	3	04/3 =	###										
AL0	ABC	0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=	3	05/3 =	.47										
AL0	ABC	0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=	3	06/3 =	.8										
AL0	ABC	0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=	3	07/3 =	.23										
AL0	ABC	0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=	3	08/3 =	.4										
AL0	ABC	0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=	3	09/3 =	.2										
AL0	ABC	0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=	3	10/3 =	.2										
AL0	ABC	0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=	3	11/3 =	.27										
AL0	ABC	0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=	3	12/3 =	.71										
AL0	ABC	0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=	3	01/3 =	###										
AL0	ABC	0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=	3	02/2 =	.73										
AL0	ABC	0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=	3	03/3 =	.71										
AL0	ABC	0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=	3	04/3 =	###										
AL0	ABC	0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=	3	05/3 =	.43										
AL0	ABC	0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=	3	06/3 =	.74										
AL0	ABC	0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=	3	07/3 =	.67										
AL0	ABC	0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=	3	08/3 =	###										
AL0	ABC	0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=	3	09/3 =	.39										
AL0	ABC	0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=	3	10/3 =	.25										
AL0	ABC	0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=	3	11/3 =	.37										
AL0	ABC	0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=	3	12/3 =	###										
AL0	ABC	0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=	3	01/3 =	###										
AL0	ABC	0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=	3	02/2 =	.66										
AL0	ABC	0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=	3	03/3 =	.37										
AL0	ABC	0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=	3	04/3 =	.44		D90		N	Non	6/28	2	RE -	7/26	

NPD	Perr	Vers	DSD	Para	Para	Mon	Mon	Limi	Cha	Lim	Limi	Stat	Lim	Lim	Mon	DMF	DMF	NOD	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=		3	05/3 =	.48								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=		3	06/3 =	.6								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=		3	07/3 =	###								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=		3	08/3 =	.9								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=		3	09/3 =	.35								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=		3	10/3 =	.37								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=		3	11/3 =	.21								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C2	Milli	MO	<=		3	12/3 =	.44								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAll	<=		6	01/3 =	###	D90		K	Non	3/31	2	RE - 6/23	
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAll	<=		6	02/2 =	.9	D90		K	Non	4/28	2	RE - 6/23	
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAll	<=		6	03/3 =	###								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAll	<=		6	04/3 =	###								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAll	<=		6	05/3 =	.78								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAll	<=		6	06/3 =	###								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAll	<=		6	07/3 =	.33								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAll	<=		6	08/3 =	.4								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAll	<=		6	09/3 =	.2								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAll	<=		6	10/3 =	.25								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAll	<=		6	11/3 =	.36								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAll	<=		6	12/3 =	.81								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAll	<=		6	01/3 =	###								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAll	<=		6	02/2 =	.73								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAll	<=		6	03/3 =	###								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAll	<=		6	04/3 =	###								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAll	<=		6	05/3 =	.53								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAll	<=		6	06/3 =	###								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAll	<=		6	07/3 =	.76								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAll	<=		6	08/3 =	.19								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAll	<=		6	09/3 =	.57								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAll	<=		6	10/3 =	.27								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAll	<=		6	11/3 =	###								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAll	<=		6	12/3 =	###								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAll	<=		6	01/3 =	###								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAll	<=		6	02/2 =	.72								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAll	<=		6	03/3 =	###								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAll	<=		6	04/3 =	###	D90		K	Non	6/28	2	RE - 7/26	
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAll	<=		6	05/3 =	###								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAll	<=		6	06/3 =	.7								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAll	<=		6	07/3 =	###								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAll	<=		6	08/3 =	1.6								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAll	<=		6	09/3 =	.52								
AL0	ABC		0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAll	<=		6	10/3 =	###								

NPD	Perr	Vers	DSD	Para	Para	Mon	Mon	Lim	Cha	Lim	Limi	Stat	Limi	Limi	Mon	DMF	DMF	NOD	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAIl	<=	6	11/3 =	.32										
AL0	ABC	0	002	010	Iron,	1	Efflu	0	Base	C3	Milli	DAIl	<=	6	12/3 =	.56										
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	01/3 =	###			D90		N	Non	3/31	2	RE -	6/23
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	02/2 =	.1			D90		N	Non	4/28	2	RE -	6/23
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	03/3 =	###										
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	04/3 =	.1										
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	05/3 =	###										
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	06/3 =	###										
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	07/3 =	.14										
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	08/3 =	###										
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	09/3 =	.06										
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	10/3 =	###										
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	11/3 =	###										
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	12/3 =	###										
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	01/3 =	.1										
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	02/2 =	.15										
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	03/3 =	.14										
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	04/3 =	###										
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	05/3 =	.21										
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	06/3 =	.31										
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	07/3 =	.34										
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	08/3 =	###										
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	09/3 =	.14										
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	10/3 =	.09										
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	11/3 =	.21										
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	12/3 =	.22										
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	01/3 =	.12										
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	02/2 =	.13										
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	03/3 =	.32										
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	04/3 =	.53			D90		N	Non	6/28	2	RE -	7/26
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	05/3 =	.18										
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	06/3 =	.3										
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	07/3 =	###										
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	08/3 =	.2										
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	09/3 =	.12										
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	10/3 =	###										
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	11/3 =	.35										
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C2	Milli	MO	<=	2	12/3 =	.17										
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAIl	<=	4	01/3 =	.17			D90		K	Non	3/31	2	RE -	6/23
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAIl	<=	4	02/2 =	.11			D90		K	Non	4/28	2	RE -	6/23
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAIl	<=	4	03/3 =	.12										
AL0	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAIl	<=	4	04/3 =	###										

NPC	Perr	Vers	DSC	Para	Para	Mon	Mon	Limi	Cha	Lim	Lim	Stat	Limi	Limi	Mon	DMF	DMF	NOD	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
ALO	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAll	<=	4	05/3	=	.05									
ALO	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAll	<=	4	06/3	=	###									
ALO	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAll	<=	4	07/3	=	.23									
ALO	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAll	<=	4	08/3	=	.24									
ALO	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAll	<=	4	09/3	=	.07									
ALO	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAll	<=	4	10/3	=	.06									
ALO	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAll	<=	4	11/3	=	.06									
ALO	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAll	<=	4	12/3	=	.08									
ALO	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAll	<=	4	01/3	=	.1									
ALO	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAll	<=	4	02/2	=	.15									
ALO	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAll	<=	4	03/3	=	###									
ALO	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAll	<=	4	04/3	=	###									
ALO	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAll	<=	4	05/3	=	.23									
ALO	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAll	<=	4	06/3	=	.42									
ALO	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAll	<=	4	07/3	=	.38									
ALO	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAll	<=	4	08/3	=	.38									
ALO	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAll	<=	4	09/3	=	###									
ALO	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAll	<=	4	10/3	=	.09									
ALO	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAll	<=	4	11/3	=	###									
ALO	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAll	<=	4	12/3	=	.26									
ALO	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAll	<=	4	01/3	=	###									
ALO	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAll	<=	4	02/2	=	.13									
ALO	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAll	<=	4	03/3	=	###									
ALO	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAll	<=	4	04/3	=	###	D90	K	Non	6/28	2	RE - 7/26			
ALO	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAll	<=	4	05/3	=	###									
ALO	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAll	<=	4	06/3	=	.4									
ALO	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAll	<=	4	07/3	=	###									
ALO	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAll	<=	4	08/3	=	.21									
ALO	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAll	<=	4	09/3	=	.14									
ALO	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAll	<=	4	10/3	=	###									
ALO	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAll	<=	4	11/3	=	.58									
ALO	ABC	0	002	010	Man	1	Efflu	0	Base	C3	Milli	DAll	<=	4	12/3	=	.17									
ALO	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	01/3	=		D90	N	Non	3/31	2	RE - 6/23			
ALO	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	02/2	=		D90	N	Non	4/28	2	RE - 6/23			
ALO	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	03/3	=										
ALO	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	04/3	=										
ALO	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	05/3	=										
ALO	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	06/3	=										
ALO	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	07/3	=										
ALO	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	08/3	=										
ALO	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	09/3	=										
ALO	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	10/3	=										

NPD	Perr	Vers	DSD	Para	Para	Mon	Mon	Lim	Cha	Lim	Lim	Stat	Lim	Lim	Mon	DMF	DMF	NOD	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	11/3 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	12/3 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	01/3 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	02/2 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	03/3 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	04/3 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	05/3 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	06/3 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	07/3 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	08/3 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	09/3 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	10/3 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	11/3 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	12/3 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	01/3 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	02/2			B								
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	03/3			B								
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	04/3			B	D90		N	Non	6/28	2	RE - 7/26	
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	05/3			B								
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	06/3			B								
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	07/3			B								
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	08/3			B								
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	09/3			B								
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	10/3			B								
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	11/3			B								
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C2	Milli	MO	<=	10	12/3			B								
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAll	<=	15	01/3 =				D90		K	Non	3/31	2	RE - 6/23	
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAll	<=	15	02/2 =				D90		K	Non	4/28	2	RE - 6/23	
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAll	<=	15	03/3 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAll	<=	15	04/3 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAll	<=	15	05/3 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAll	<=	15	06/3 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAll	<=	15	07/3 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAll	<=	15	08/3 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAll	<=	15	09/3 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAll	<=	15	10/3 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAll	<=	15	11/3 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAll	<=	15	12/3 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAll	<=	15	01/3 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAll	<=	15	02/2 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAll	<=	15	03/3 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAll	<=	15	04/3 =											

NPC	Perr	Vers	DSC	Para	Para	Mon	Mon	Lim	Cha	Lim	Lim	Stat	Lim	Lim	Mon	DMF	DMF	NOE	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAIL	<=	15	05/3 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAIL	<=	15	06/3 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAIL	<=	15	07/3 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAIL	<=	15	08/3 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAIL	<=	15	09/3 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAIL	<=	15	10/3 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAIL	<=	15	11/3 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAIL	<=	15	12/3 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAIL	<=	15	01/3 =											
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAIL	<=	15	02/2		B									
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAIL	<=	15	03/3		B									
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAIL	<=	15	04/3		B	D90		K	Non	6/28	2		RE - 7/26	
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAIL	<=	15	05/3		B									
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAIL	<=	15	06/3		B									
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAIL	<=	15	07/3		B									
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAIL	<=	15	08/3		B									
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAIL	<=	15	09/3		B									
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAIL	<=	15	10/3		B									
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAIL	<=	15	11/3		B									
AL0	ABC	0	002	035	Oil a	1	Efflu	0	Base	C3	Milli	DAIL	<=	15	12/3		B									
AL0	ABC	0	002	340	Ben:	1	Efflu	0	Base	Q2	Poul	DAIL			01/3 =			D80		K	Non	3/31	2		RE - 6/23	
AL0	ABC	0	002	340	Ben:	1	Efflu	0	Base	Q2	Poul	DAIL			02/2 =			D80		K	Non	4/28	2		RE - 6/23	
AL0	ABC	0	002	340	Ben:	1	Efflu	0	Base	Q2	Poul	DAIL			03/3 =											
AL0	ABC	0	002	340	Ben:	1	Efflu	0	Base	Q2	Poul	DAIL			04/3 =											
AL0	ABC	0	002	340	Ben:	1	Efflu	0	Base	Q2	Poul	DAIL			05/3 =											
AL0	ABC	0	002	340	Ben:	1	Efflu	0	Base	Q2	Poul	DAIL			06/3 =											
AL0	ABC	0	002	340	Ben:	1	Efflu	0	Base	Q2	Poul	DAIL			07/3 =											
AL0	ABC	0	002	340	Ben:	1	Efflu	0	Base	Q2	Poul	DAIL			08/3 =											
AL0	ABC	0	002	340	Ben:	1	Efflu	0	Base	Q2	Poul	DAIL			09/3 =											
AL0	ABC	0	002	340	Ben:	1	Efflu	0	Base	Q2	Poul	DAIL			10/3 =											
AL0	ABC	0	002	340	Ben:	1	Efflu	0	Base	Q2	Poul	DAIL			11/3 =											
AL0	ABC	0	002	340	Ben:	1	Efflu	0	Base	Q2	Poul	DAIL			12/3 =											
AL0	ABC	0	002	340	Ben:	1	Efflu	0	Base	Q2	Poul	DAIL			01/3 =											
AL0	ABC	0	002	340	Ben:	1	Efflu	0	Base	Q2	Poul	DAIL			02/2 =											
AL0	ABC	0	002	340	Ben:	1	Efflu	0	Base	Q2	Poul	DAIL			03/3 =											
AL0	ABC	0	002	340	Ben:	1	Efflu	0	Base	Q2	Poul	DAIL			04/3 =											
AL0	ABC	0	002	340	Ben:	1	Efflu	0	Base	Q2	Poul	DAIL			05/3 =											
AL0	ABC	0	002	340	Ben:	1	Efflu	0	Base	Q2	Poul	DAIL			06/3 =											
AL0	ABC	0	002	340	Ben:	1	Efflu	0	Base	Q2	Poul	DAIL			07/3 =											
AL0	ABC	0	002	340	Ben:	1	Efflu	0	Base	Q2	Poul	DAIL			08/3 =											
AL0	ABC	0	002	340	Ben:	1	Efflu	0	Base	Q2	Poul	DAIL			09/3 =											
AL0	ABC	0	002	340	Ben:	1	Efflu	0	Base	Q2	Poul	DAIL			10/3 =											

NPD	Perr	Vers	DSD	Para	Para	Mon	Mon	Lim	Cha	Lim	Lim	Stat	Lim	Lim	Mon	DMF	DMF	NOD	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	002	340	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			11/3 =											
AL0	ABC	0	002	340	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			12/3 =											
AL0	ABC	0	002	340	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			01/3 =											
AL0	ABC	0	002	340	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			02/2			B								
AL0	ABC	0	002	340	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			03/3			B								
AL0	ABC	0	002	340	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			04/3			B	D80		K	Non	6/28	2		RE - 7/26
AL0	ABC	0	002	340	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			05/3			B								
AL0	ABC	0	002	340	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			06/3			B								
AL0	ABC	0	002	340	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			07/3			B								
AL0	ABC	0	002	340	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			08/3			B								
AL0	ABC	0	002	340	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			09/3 =											
AL0	ABC	0	002	340	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			10/3			B								
AL0	ABC	0	002	340	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			11/3			B								
AL0	ABC	0	002	340	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			12/3			B								
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			01/3 =				D80		K	Non	3/31	2		RE - 6/23
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			02/2 =				D80		K	Non	4/28	2		RE - 6/23
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			03/3 =											
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			04/3 =											
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			05/3 =											
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			06/3 =											
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			07/3 =											
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			08/3 =											
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			09/3 =											
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			10/3 =											
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			11/3 =											
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			12/3 =											
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			01/3 =											
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			02/2 =											
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			03/3 =											
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			04/3 =											
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			05/3 =											
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			06/3 =											
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			07/3 =											
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			08/3 =											
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			09/3 =											
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			10/3 =											
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			11/3 =											
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			12/3 =											
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			01/3 =											
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			02/2			B								
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			03/3			B								
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			04/3			B	D80		K	Non	6/28	2		RE - 7/26

NPD	Perr	Vers	DSD	Para	Para	Mon	Mon	Limi	Cha	Lim	Lim	Stat	Lim	Lim	Mon	DMF	DMF	NOD	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			05/3		B									
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			06/3		B									
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			07/3		B									
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			08/3		B									
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			09/3		B									
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			10/3		B									
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			11/3		B									
AL0	ABC	0	002	342	Ben	1	Efflu	0	Base	Q2	Poul	DAIl			12/3		B									
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Poul	DAIl			01/3	=			D80	K	Non	3/31	2	RE - 6/23		
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Poul	DAIl			02/2	=			D80	K	Non	4/28	2	RE - 6/23		
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Poul	DAIl			03/3	=										
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Poul	DAIl			04/3	=										
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Poul	DAIl			05/3	=										
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Poul	DAIl			06/3	=										
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Poul	DAIl			07/3	=										
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Poul	DAIl			08/3	=										
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Poul	DAIl			09/3	=										
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Poul	DAIl			10/3	=										
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Poul	DAIl			11/3	=										
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Poul	DAIl			12/3	=										
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Poul	DAIl			01/3	=										
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Poul	DAIl			02/2	=										
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Poul	DAIl			03/3	=										
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Poul	DAIl			04/3	=										
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Poul	DAIl			05/3	=										
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Poul	DAIl			06/3	=										
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Poul	DAIl			07/3	=										
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Poul	DAIl			08/3	=										
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Poul	DAIl			09/3	=										
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Poul	DAIl			10/3	=										
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Poul	DAIl			11/3	=										
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Poul	DAIl			12/3	=										
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Poul	DAIl			01/3	=										
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Poul	DAIl			02/2		B									
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Poul	DAIl			03/3		B									
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Poul	DAIl			04/3		B		D80	K	Non	6/28	2	RE - 7/26		
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Poul	DAIl			05/3		B									
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Poul	DAIl			06/3		B									
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Poul	DAIl			07/3		B									
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Poul	DAIl			08/3		B									
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Poul	DAIl			09/3	=										
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Poul	DAIl			10/3		B									

NPD	Perr	Vers	DSD	Para	Para	Mon	Mon	Limi	Cha	Lim	Limi	Stat	Lim	Lim	Mon	DMR	DMR	NOD	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Pour	DAIl			11/3			B								
AL0	ABC	0	002	346	Nap	1	Efflu	0	Base	Q2	Pour	DAIl			12/3			B								
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			01/3 =				D80	K	Non	3/31	2	RE - 6/23		
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			02/2 =				D80	K	Non	4/28	2	RE - 6/23		
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			03/3 =											
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			04/3 =											
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			05/3 =											
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			06/3 =											
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			07/3 =											
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			08/3 =											
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			09/3 =											
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			10/3 =											
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			11/3 =											
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			12/3 =											
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			01/3 =											
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			02/2 =											
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			03/3 =											
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			04/3 =											
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			05/3 =											
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			06/3 =											
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			07/3 =											
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			08/3 =											
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			09/3 =											
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			10/3 =											
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			11/3 =											
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			12/3 =											
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			01/3 =											
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			02/2 =											
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			03/3 =											
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			04/3 =				D80	K	Non	6/28	2	RE - 7/26		
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			05/3 =											
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			06/3 =											
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			07/3 =											
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			08/3 =											
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			09/3 =											
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			10/3 =											
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			11/3 =											
AL0	ABC	0	002	460	Phei	1	Efflu	0	Base	Q2	Pour	DAIl			12/3 =											
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			01/3 =	###			D80	N	Non	3/31	2	RE - 6/23		
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			02/2 =	###			D80	N	Non	4/28	2	RE - 6/23		
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			03/3 =	###										
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			04/3 =	###										

NPC	Perr	Vers	DSC	Para	Para	Mon	Mon	Limi	Cha	Lim	Lim	Stat	Lim	Lim	Mon	DMF	DMF	NOD	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			05/3 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			06/3 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			07/3 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			08/3 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			09/3 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			10/3 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			11/3 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			12/3 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			01/3 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			02/2 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			03/3 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			04/3 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			05/3 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			06/3 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			07/3 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			08/3 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			09/3 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			10/3 =		1.6									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			11/3 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			12/3 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			01/3 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			02/2 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			03/3 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			04/3 =		###		D80		N	Non	6/28	2	RE - 7/26	
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			05/3 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			06/3 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			07/3 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			08/3 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			09/3 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			10/3 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			11/3 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q1	Milli	MO			12/3 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAI			01/3 =		.96		D80		K	Non	3/31	2	RE - 6/23	
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAI			02/2 =		###		D80		K	Non	4/28	2	RE - 6/23	
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAI			03/3 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAI			04/3 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAI			05/3 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAI			06/3 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAI			07/3 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAI			08/3 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAI			09/3 =		###									
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAI			10/3 =		###									

NPC	Perr	Vers	DSC	Para	Para	Mon	Mon	Lim	Cha	Lim	Lim	Stat	Lim	Lim	Mon	DMF	DMF	NOI	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIl			11/3 =	###										
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIl			12/3 =	###										
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIl			01/3 =	###										
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIl			02/2 =	###										
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIl			03/3 =	###										
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIl			04/3 =	###										
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIl			05/3 =	###										
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIl			06/3 =	###										
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIl			07/3 =	###										
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIl			08/3 =	###										
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIl			09/3 =	###										
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIl			10/3 =	###										
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIl			11/3 =	###										
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIl			12/3 =	###										
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIl			01/3 =	###										
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIl			02/2 =	###										
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIl			03/3 =	###										
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIl			04/3 =	###	D80		K	Non	6/28	2	RE - 7/26			
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIl			05/3 =	###										
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIl			06/3 =	###										
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIl			07/3 =	###										
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIl			08/3 =	###										
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIl			09/3 =	###										
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIl			10/3 =	###										
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIl			11/3 =	###										
AL0	ABC	0	002	500	Flow	1	Efflu	0	Base	Q2	Milli	DAIl			12/3 =	###										
AL0	ABC	0	002	615	Amn	1	Efflu	0	Base	Q1	Poul	MO			01/3 =	###	D80		N	Non	3/31	2	RE - 6/23			
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AL0	ABC	0	002	615	Amn	1	Efflu	0	Base	Q1	Poul	MO			05/3 =	###										
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NPD	Perr	Vers	DSE	Para	Para	Mon	Mon	Limi	Cha	Lim	Limi	Stat	Lim	Lim	Mon	DMF	DMF	NOE	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
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AL0	ABC	0	002	615	Amn	1	Efflu	0	Base	Q1	Poui	MO			08/3 =	###										
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NPD	Perr	Vers	DSD	Para	Para	Mon	Mon	Limi	Cha	Lim	Lim	Stat	Lim	Lim	Mon	DMF	DMF	NOD	Viol	Perc	RNC	RNC	RNC	RNC	RNC	RNC
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AL0	ABC	0	002	615	Amn	1	Efflu	0	Base	Q2	Poul	DAIL			12/3 =		###									

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

MAY 10 2013

CERTIFIED MAIL 7012 1010 0001 8097 4311
RETURN RECEIPT REQUESTED

Mr. W. M. Poling
Manager, Engineering
ABC Coke
P.O. Box 10246
Birmingham, Alabama 35202

Re: Compliance Evaluation Inspection
Letter of Concern
National Pollutant Discharge Elimination System Permit No. AL0003417

Dear Mr. Poling:

On August 13-16, 2012, the U.S. Environmental Protection Agency, Region 4 and the Alabama Department of Environment Management (ADEM) performed a Compliance Evaluation Inspection (CEI) of the ABC Coke facility (Facility). Enclosed is the CEI report and photographs taken during the CEI. The EPA's participation in this inspection was to evaluate the Facility's compliance with the treatment of process wastewater and stormwater in accordance with the requirements of the Clean Water Act (CWA) and the ADEM National Pollutant Discharge Elimination System (NPDES) Permit Number AL0003417.

Based on the information obtained and onsite observations during the CEI, the EPA has concerns regarding the following:

1. The methods used to analyze Iron, Manganese, Benzo(a) pyrene, Napthalene and Benzene do not comply with 40 C.F.R. Part 136.3(a) and an alternate test procedure has not been approved by the Region;

2. At the time of inspection, the chain of custody did not document whether the preservatives for the Iron and Manganese samples were maintained at a pH of two or less;

3. Four unauthorized non-stormwater discharges were observed draining to the stormwater retention pond at the time of inspection. This pond is authorized by the NPDES permit solely for stormwater runoff from the coal yard. The four unauthorized sources are as follows:

    a. Cooling water blow down
    b. Coal blending wash water
    c. Coke truck loading quenching water
    d. Jefferson County Industrial water

4. The Facility's development of a Best Management Plan (BMP) does not address all permit elements and is deficient in the areas of BMP Records and Reporting as well as BMP Implementation as noted on page 13 of the attached report.

These concerns are outlined in more detail in the enclosed CEI report. Please provide all requested information as well as the corrective actions your Facility has taken or plans to take to address the deficiencies identified in the CEI report and to ensure compliance with the Permit. The requested information and corrective actions should be submitted within 30 days of receipt of this letter.

Failure to comply with the requirements of the Permit and the CWA may subject the Facility to enforcement action pursuant to Section 309 of the CWA. This Section provides for the issuance of administrative penalty and compliance orders and/or the initiation of civil and/or criminal actions.

Enclosed is a document entitled *U.S. EPA Small Business Resources-Information Sheet* to assist you in understanding the compliance assistance resources and tools available to you. Any decision to seek compliance assistance at this time, however, does not relieve you of your obligation to the EPA nor does it create any new rights or defenses, and will not affect the EPA's decision to pursue enforcement action. In addition, the Securities and Exchange Commission (Commission) requires its registrants to periodically disclose environmental legal proceedings in statements filed with the Commission. To assist you, the EPA has also enclosed a document entitled *Notice of Securities and Exchange Commission Registrants' Duty to Disclose Environmental Legal Proceedings.*

Please direct your response to this inquiry to Ms. Alenda Johnson or Mr. Kenneth Kwan, of the Clean Water Enforcement Branch, using the above address. If you should have any further questions, you may contact Ms. Johnson at (404) 562-9761 or Mr. Kwan at (404) 562-9752.

Sincerely,

for

Denisse D. Diaz, Chief
Clean Water Enforcement Branch
Water Protection Division

Enclosures

cc: Ms. Daphne Smart
Alabama Department of Environmental Management

Compliance Evaluation Inspection

ABC Coke Municipal Wastewater Treatment and Stormwater Inspection,
August 13-16, 2012

INTRODUCTION

On August 13-16, 2012, representatives of the United States Environmental Protection Agency, Region 4 and the Alabama Department of Environmental Management (ADEM) conducted a Compliance Evaluation Inspection (CEI) and a Compliance Stormwater Evaluation Inspection (CSWEI) of the ABC Coke (Facility) in Birmingham, Alabama. The CEI included the Biological Treatment Facility (BTF) and the CSWEI included stormwater management practices of the industrial site. The primary purpose of these inspections was to evaluate compliance with the Clean Water Act (CWA) as it relates to industrial wastewater and stormwater discharges.

This inspection report will be divided into two parts. Part VI will provide additional details on the wastewater treatment process and inspection findings related to the National Pollutant Discharge Elimination System (NPDES) permit outfall 001 and related facilities and Part VII will cover the inspection findings related to the Compliance Storm Water Evaluation Inspections, NPDES outfall 002 and related facilities.

I. OVERVIEW

ABC Coke is classified under Standard Industrial Classification Code 3312 for its manufacturing of inorganic petroleum catalysts. The industrial manufacturing process creates coal tar, light oil and coke oven gas by-products which are processed at the by-products plant. The Facility employs approximately 375 persons and operates continuously to processes two different chemistries of coke. The main products produced are furnace and foundry coke.

The Facility includes over 30 acres of coal and coke stock pile as well as an Equipment and Process area, a diesel tank secondary treatment area, Light Oil storage area, Gasoline storage area, Coke Oven Battery area, By-products area, Coal Tar storage, Coke Quenching area, Coke Blending area, Coal Handling area and Coal Blending area. The Vulcan Materials Company is located southwest of the Facility and the Walter Coke Biological Treatment Facility is located to the west (see Photo 1).

II. REGULATORY SUMMARY

The Facility's National Pollutant Discharge Elimination System (NPDES) permit became effective on April 1, 2009 and covers two separate regulated outfalls; 001 and 002. The permit expires on March 31, 2014. Outfall 001 discharges treated process wastewater and storm water runoff from coke making operations. Outfall 002 discharges treated stormwater run-off from the coal yard.

The Facility's effluent limitations are technology-based limits which were developed using the effluent guidelines and water quality standards. A total list of parameters for Outfall 001 includes: Dissolved Oxygen, pH, Total Suspended Solids (TSS), Total Kjeldahl Nitrogen (TKN), Total Nitrite Plus Nitrate, Total Phosphorus, Total Cyanide, Total Iron, Total Manganese, Oil and Grease (O&G), Benzo (A) Pyrene, Naphthalene, Phenols, Flow, Free Available Cyanide, Ammonia (as Nitrogen) and Carbonaceous Biochemical Oxygen Demand (5-day). The

Carbonaceous Biochemical Oxygen Demand, Ammonia (as Nitrogen), and TKN parameters have seasonal limits based on a waste load allocation model. A total list of parameters for Outfall 002 includes: pH, TSS, O&G, Ammonia (as Nitrogen), Total Cyanide, Total Iron, Total Manganese, Benzene, Phenols, Flow, Naphthalene and Benzo (A) Pyrene based upon effluent guidelines.

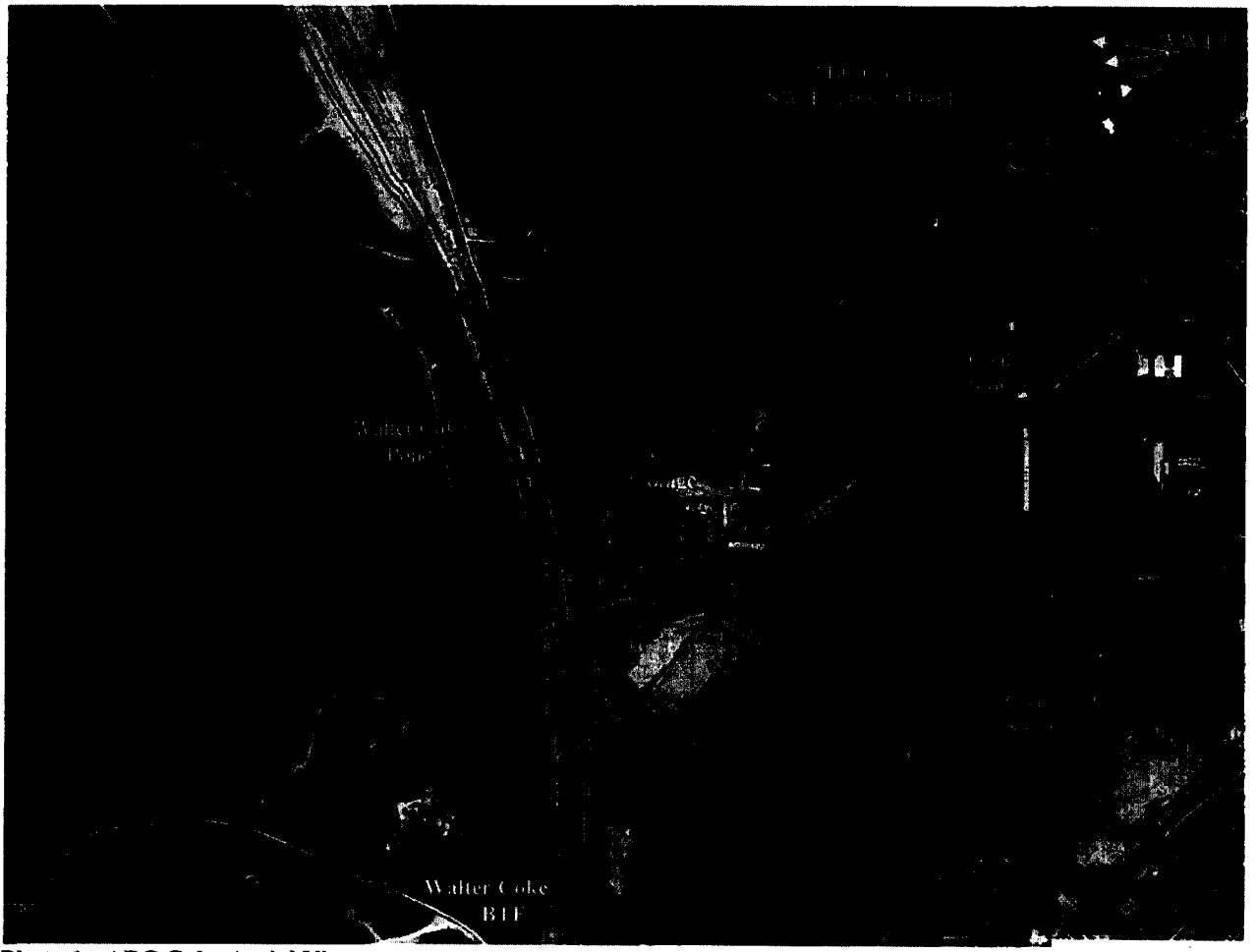


Photo 1 - ABC Coke Aerial View

The Facility operates an activated sludge biological treatment facility designed to treat phenol and cyanide through retention time. Figure 1 is a schematic diagram of the process wastewater flow for both Outfalls 001 and Outfall 002. The configuration of the schematic diagram is based on information provided to the EPA by ABC Coke.

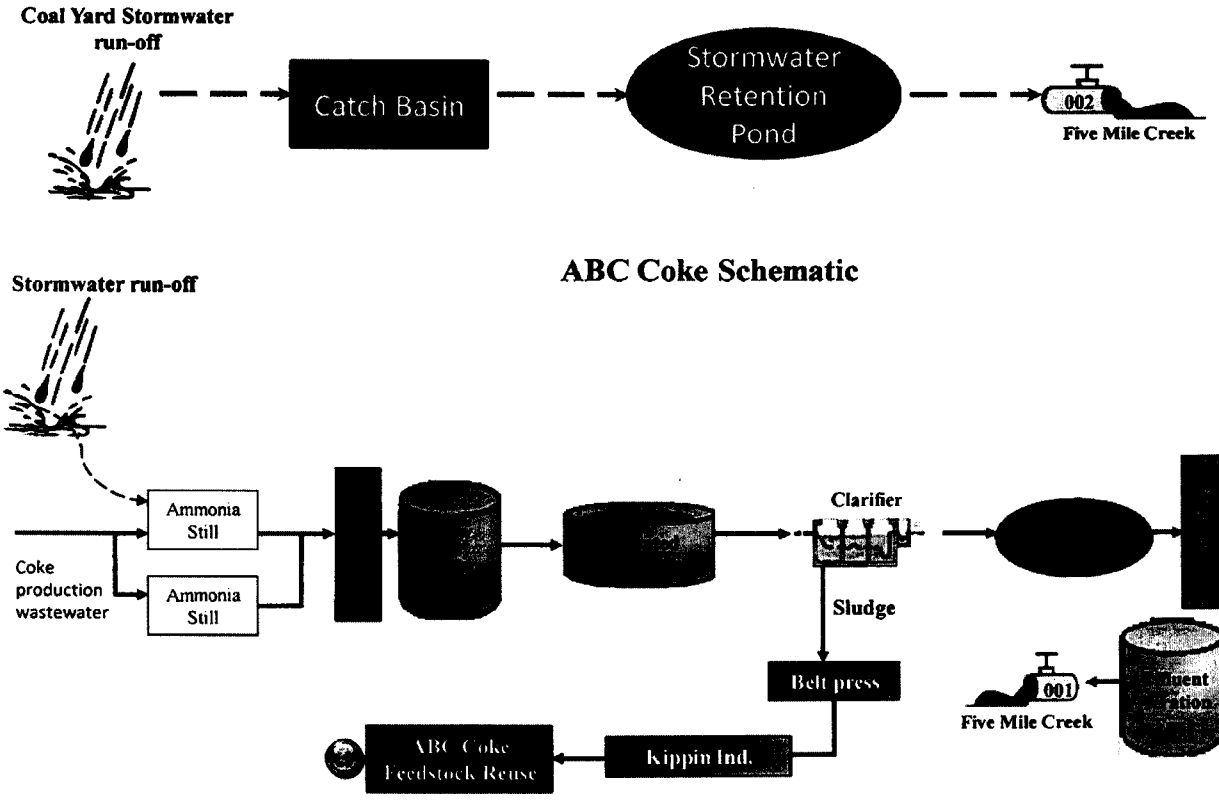


Figure 1 - ABC Coke Wastewater and Stormwater treatment Schematic

III. OBJECTIVE

The purpose of this CEI is to evaluate compliance with the CWA as it relates to the NPDES Permit AL0003417.

IV. INVESTIGATION METHODS

The investigation included:

a. Review of the EPA's water document request provided to ABC Coke and made available to the EPA on 08/13/12;
b. Interviews with Facility personnel;
c. Review of the Facility's records/documents/plans;
d. On-site inspection; and,

e. The EPA's retrieval of Discharge Monitoring Report (DMR) data from the Integrated Compliance Information System (ICIS) database.

V. FACILITY SITE REVIEW

On August 13-16, 2012, representatives of the United States Environmental Protection Agency and Alabama Department of Environmental Management (ADEM) conducted a Compliance Evaluation Inspection (CEI) and a Compliance Stormwater Evaluation Inspection (CSWEI) of the ABC Coke Facility (Facility) in Birmingham, Alabama. The Wastewater Treatment Plant CEI was conducted on August 13-14, 2012 and the CSWEI included evaluation of the stormwater management practices of the industrial site on August 15-16, 2013. The primary purpose of these inspections was to evaluate compliance with the Clean Water Act (CWA) as it relates to industrial wastewater and stormwater discharges. The Clean Water Act (CWA) regulates, among other things, the discharge of pollutants to surface waters. Requirements of the CWA include a prohibition on the discharge of pollutants except when the discharge is in compliance with requirements established by the U.S. Environmental Protection Agency in Part 40 of the Code of Federal Regulations (C.F.R) § 122.26 or an authorized state in an appropriate National Pollutant Discharge Elimination System (NPDES) permit.

This inspection report will be divided into two parts. Part VI will cover the industrial wastewater outfalls authorized under the National Pollutant Discharge Elimination System (NPDES) permit and related facilities and Part VII will cover stormwater management and related facilities.

VI. INDUSTRIAL PROCESSES AND WASTEWATER TREATMENT PLANT

1. **Ammonia Stills** – The Facility has two Ammonia Stills at a design flow of 250 gallons per minute (GPM) each. Under normal operation, the facility uses one Ammonia Still at a time. The process wastewater from the Coke Plant is pretreated at the Ammonia Stills which removes the ammonia and amenable cyanide ions. The Facility also reported that the Ammonia Stills is the only treatment vessel for benzene removal.

2. **Coolers** – The process wastewater discharged to the Ammonia Stills is at a temperature of approximately 190°C. The coolers treat the wastewater by reducing the temperature to approximately 120°C (see Photo 2). The water is then stored in the equalization basin until it is ready to receive activated sludge biological treatment at the wastewater treatment plant.

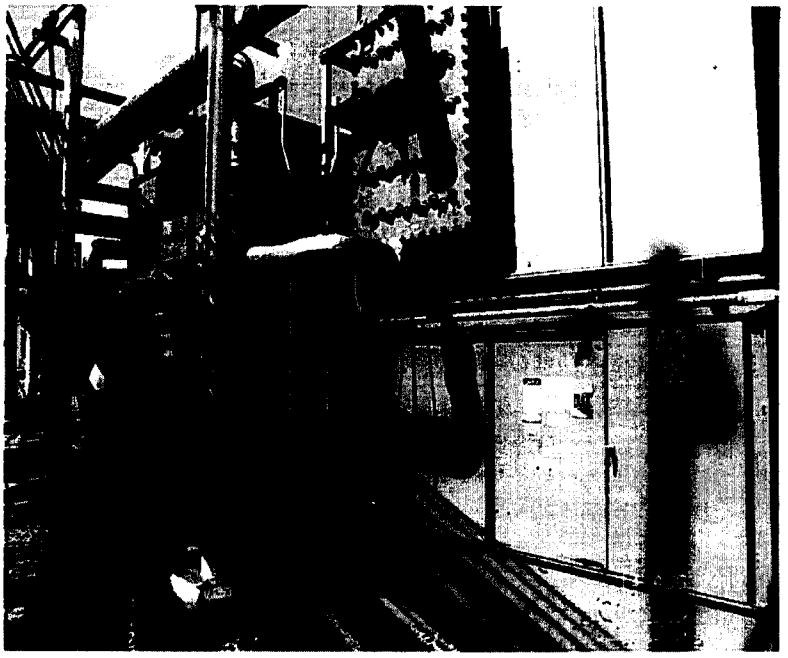


Photo 2 – Wastewater Coolers

3. **Equalization Basin** – The Equalization Basin (EQ Basin) has a design capacity of 250,000 gallons. It is capable of providing a storage time of 17 hours. A series of micro aeration lines are installed on the surface to provide for additional cooling capacity and maintaining optimum dissolved oxygen (DO) level (see Photo 3). Since the process wastewater is normally deficient in nutrient, phosphoric acid is added at the EQ Basin to ensure healthy biological activity is maintained in the wastewater at the Activate Sludge Unit (ASU). Also, antifoam is added at the inlet to control foam.

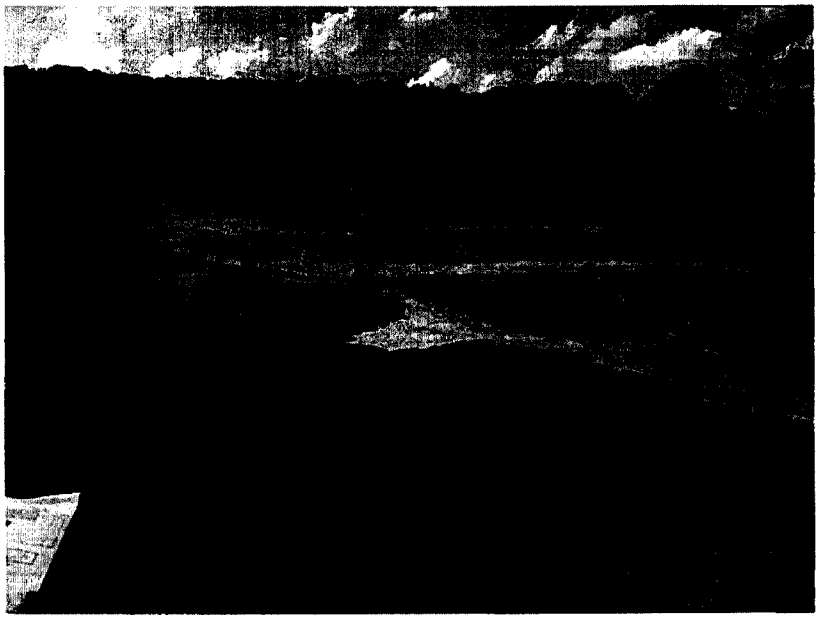


Photo 3- Flow Equalization Basin 5

4. **Activate Sludge Units** – The biological treatment system consists of two 305,000 gallon ASUs operating in series (see Photo 4). Wastewater processed through the ASU receives treatment with a sludge age of 75 days. At the time of the inspection, all the aerators were in operation and no abnormal conditions that can upset the microorganisms in the ASU were observed.

Photo 4 – Activated Sludge Unit at wastewater treatment plant

5. **Clarifier** – The Facility's two clarifiers are run in parallel. These clarifiers are 65 feet in diameter and 15 feet in depth. Polymer is added to improve settling and caustic solution is used to maintain a pH range of 7 to 7.5. The clarifier skimmer rakes are all in working order. Observation of the overflow at the weir showed no floating material at the water surface (see Photo 5).

Photo 5 - Water quality at clarifier

6. **Sedimentation Basin** – The Sedimentation Basin (see Photo 6) has two to three flowing aerators. The Basin is cleaned out once per year. The last cleanout was around June 2012.

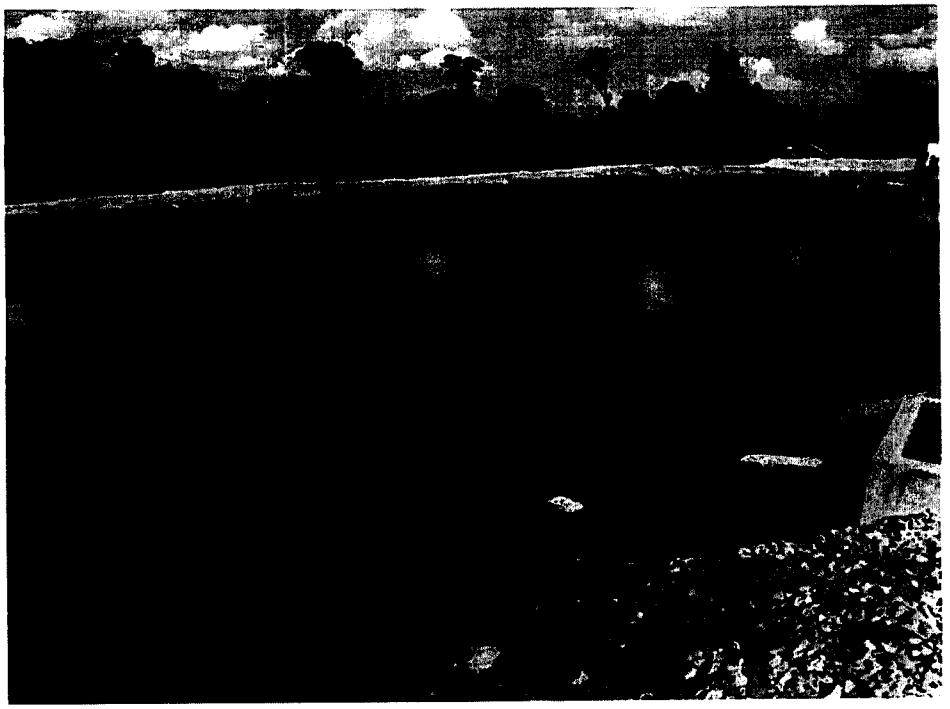


Photo 6 - Sedimentation Basin (Polishing Pond)

7. **Sand Filters and Granular Active Carbon (GAC) Columns** – The facility has four Sand Filters and four GAC Columns operating in parallel (see Photo 7). These advance treatment processes are designed to remove additional traces of solids and organic materials.

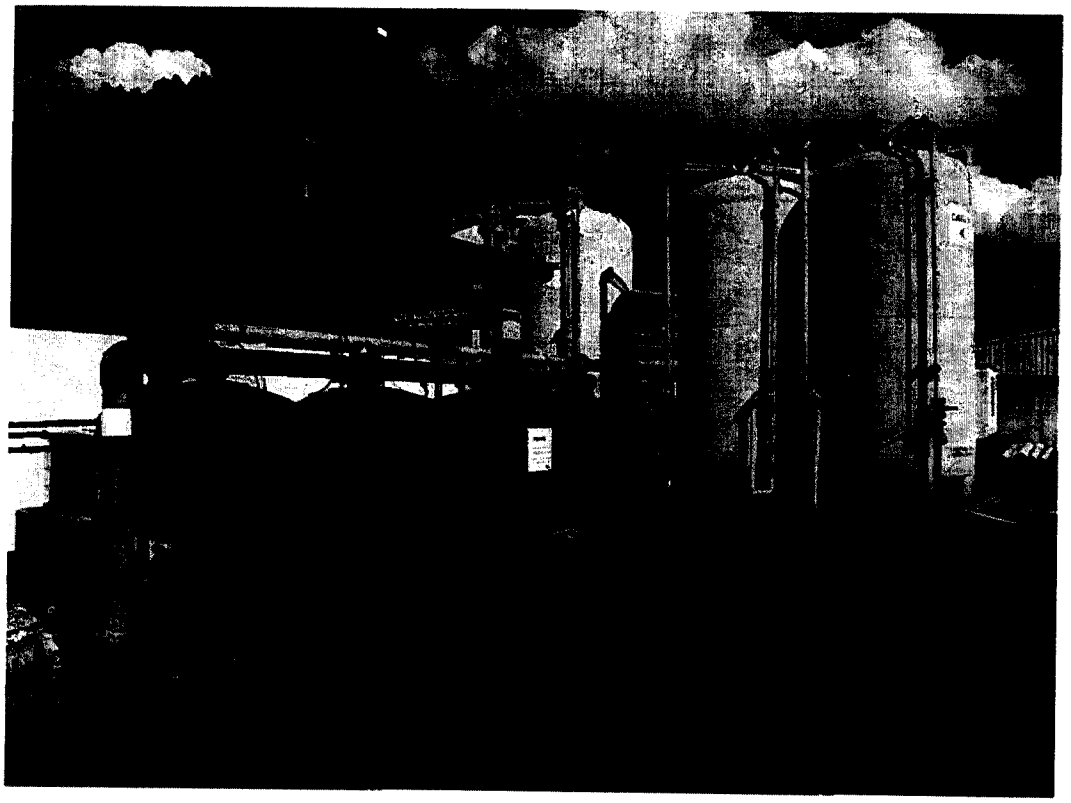


Photo 7 - Sand Filters and GAC Columns

8. **Effluent Aeration Tank** – The primary function of the Effluent Aeration Tank is to increase the DO level of the treated process wastewater from the GAC Columns.

9. **Sludge Process** –The sludge from the clarifier is wasted to a belt press (see Photo 8). Polymer is added to increase the solid content to 20%. The sludge cake is sent to Kippin Industries for processing and recycles back to the Facility for use as feed stock at the Coke Plant.

Summary: All wastewater treatment units were properly operating at the time of inspection.

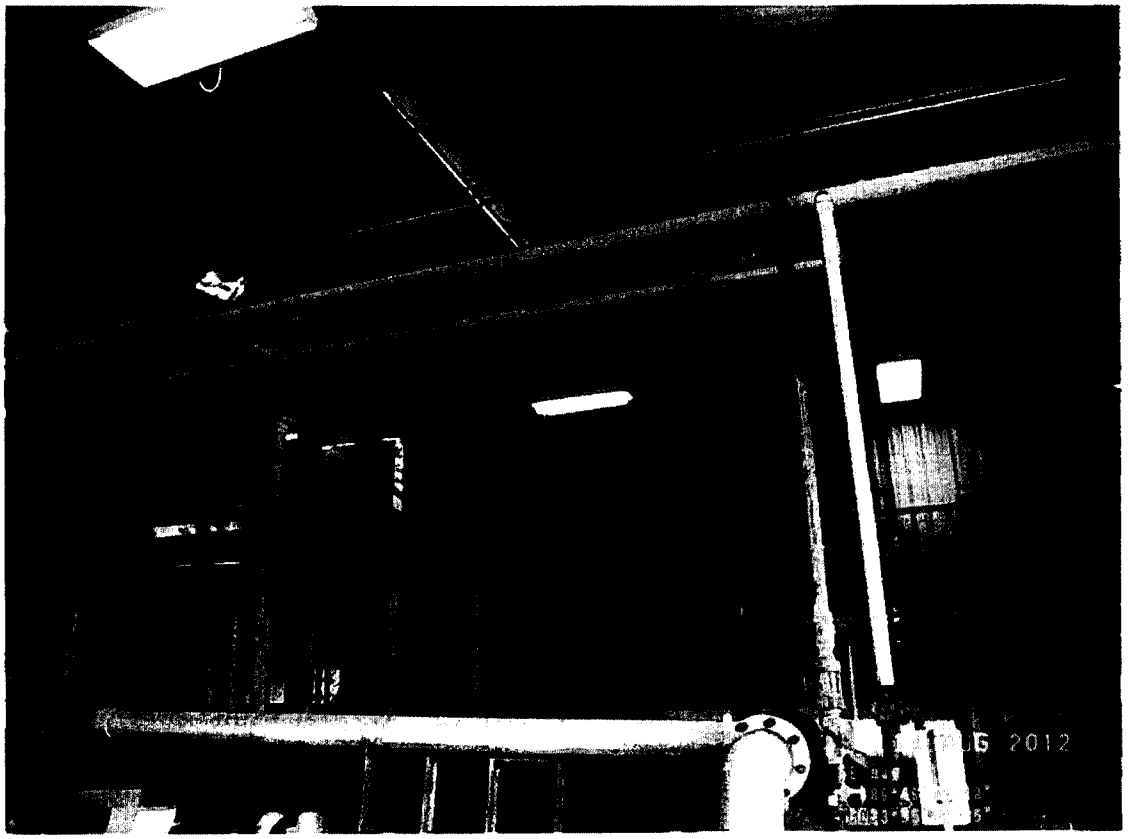


Photo 8 - Sludge processing area

A. Document Review and Analysis

This Section will summarize the compliance documents reviewed during and after the inspection. Documents reviewed include the NPDES Permit, DMRs and Whole Effluent Toxicity (WET) reports.

1. Discharge Monitoring Report Data Analysis

DMRs were reviewed from copies provided by the Facility for the months of March 2010 through May 2012. Past DMR information was reviewed off-site using data from ICIS for the months of January 2010 through December 2012. The DMR review included the analytical results and chain of custody used to prepare the reports. Table 1 shows the Facility's three year compliance record.

Table 1. DMR violations from January 2010 to December 2012

Parameter	Violation	Measurement	Limit	Outfall	Reporting Period
Ammonia Nitrogen + Unionized Ammonia	Daily Maximum	52.6 lbs/day	52.4lbs/day	001	01/31/2010
Ammonia Nitrogen + Unionized Ammonia	Monthly Avg.	52.6 lbs/day	33.1 lbs/day	001	01/31/2010

Summary: The records reviewed during the inspection showed the contracted lab is using method SW6010B to analyze Iron and Manganese, method SW8270C to analyze Benzo (A) Pyrene and method SW8260C to analyze Naphthalene and Benzene. These methods are typically used to analyze wastes, soils, sludges and sediments. NPDES compliance monitoring has specific methods that are approved for use in testing analytes listed in Part I of ABC Coke's permit. Additionally when metals such as Iron or Manganese are being transported prior to analysis, they are required to be preserved at a pH of 2 or less or at least 24hours prior to analysis to comply with the approved EPA Method. The chain of custody did not document if the sample was tested to assure that the pH was at a level of 2 or less.

Deficiencies:

1. 40 CFR Part 136.3 (a) requires the analytes to be determined by one of the standard analytical test procedures incorporated by reference and described in Tables IA, IB, IC, IE, and IF, or by any alternate test procedure which has been approved by the Administrator under the provisions of paragraph (d) of this section and §§ 136.4 and 136.5. Under certain circumstances other test procedures may be more advantageous when such other test procedures have been previously approved by the Regional Administrator of the Region in which the discharge will occur, and providing the Director of the State in which such discharge will occur does not object to the use of such alternate test procedure. There was no documentation showing that an alternate test procedure has been approved.

2. 40 CFR Part 136.3 (a) requires metals to be preserved with nitric acid to a pH of 2 or less to make dissolve any metals that may adsorb to the container wall. An aquaeous sample may be collected and shipped without preservation but nitric acid must be added to the sample at least 24 hours prior to analysis. The chain of custody sheets reviewed did not document if the sample was preserved with nitric acid prior to transport.

B. Whole Effluent Toxicity Analysis

The Whole Effluent Toxicity (WET) analysis consisted of an onsite review of *Ceriodaphnia dubia* and *Pimephales promelas* tests performed in January 2010 and March 2010, as well as a review of toxicity results reported in ICIS between January 2010 to December 2012. The Permit requires the permittee to perform monthly WET testing using fathead minnows (*Pimephales promelas)* and water fleas (*Ceriodaphnia dubia)* on effluent from Outfall 001. Should any monthly test demonstrate toxicity, two follow-up chronic biomonitoring tests are to be conducted consecutively beginning on the first calendar week following the date the Facility is aware of the permit noncompliance. Toxicity is demonstrated when the inhibition concentration (IC_{25}) for reproduction or growth is less than Instream Waste Concentration (IWC) of 79%.

Two sets of WET tests (also known as biomonitoring tests) were evaluated, from January and March 2010. For each of the aforementioned dates, an effluent WET test was conducted using both *Ceriodaphnia dubia* and *Pimephales promelas*. The *Pimephales promelas* effluent WET

tests were evaluated for compliance with the Permit and the standard method for chronic toxicity (EPA Method 1000.0 (*Pimephales promelas)*[1]) and the *Ceriodaphnia dubia* effluent WET tests were evaluated for compliance with the Permit and the standard method for chronic toxicity (EPA Method 1002.0 (*Ceriodaphnia dubia)*[1]). For the DMRs submitted between January 2010 through December 2012, toxicity was not demonstrated in any of the tests.

Summary: No on-going effluent limitation or WET violations.

VII. STORMWATER COMPLIANCE EVALUTATION INSPECTION

The Compliance Stormwater Evaluation was conducted on August 15 -16, 2012. The CSWEI evaluated the stormwater permit requirements including, but not limited to, records/reports, stormwater outfalls, and development and implementation of a Best Management Plan (BMP). A summary of the relevant findings are described in the subsequent sections of this report.

A. NPDES Permit

The facility's stormwater discharges are covered under the State of Alabama's NPDES Permit No. AL0003417 (Permit). The Permit has an effective date of April 1, 2009, and an expiration date of March 31, 2014. Stormwater runoff from the Facility will drain either into the process sewer or to the on-site stormwater collection system. Runoff, which may come in contact with spills and potential pollutants from the industrial, production and process areas, are drained to the process sewer and routed to the Facility's wastewater treatment plant (WWTP). Treated effluent from the WWTP is discharged via Outfall 001 to Five Mile Creek. The coal and coke yard storage areas encompass over 60% of the Facility surface area. Runoff, which may come in contact with the coal and coke yard storage areas, drains to the on-site stormwater collection system. The on-site stormwater collection system utilized underground pipes and ditches to divert stormwater into a catch basin and into a retention pond for final treatment. Treated effluent from the retention pond is discharged via Outfall 002 to Five Mile Creek.

B. Best Management Practices Plan (BMP Plan)

The Facility's BMP Plan was revised in November 2008, and was signed by Senior V.P. of Operation on December 9, 2011. The EPA has reviewed the BMP Plan and has determined that the BMP Plan should be updated and revised to address the following in accordance with the minimum requirements contained in Part IV.B of the Permit:

[1] 40 CFR, Part 136, EPA-821-R-02-013, Short-Term Methods for Estimating the Chronic Toxicity and Receiving Waters to Freshwater Organisms (4th Edition)

PERMIT REQUIREMENTS	PERMIT AND BMP PLAN DEFICIENCIES
Part IV.B.2.b – The BMP Plan requires ABC Coke to identify in a site map a prediction of the direction of stormwater flow. Also, the BMP Plan should discuss the rate of such flow and the quantity of pollutants which could be discharged from the Facility.	The Facility's site map dated June 6, 1978, did not show the direction of stormwater throughout the Facility. Also, the BMP Plan has no discussion regarding rate of flow and the quantity of pollutants which could be discharged from the Facility.
Part IV.B.2.f – The BMP Plan should designate by position or name the person or persons responsible for day to day implementation of the BMP Plan.	ABC Coke's BMP Plan did not identify these individuals or describe each person's responsibilities for the direct implementation of the BMP Plan.
Part IV.B.2.k – The BMP Plan should include a diagram showing the locations of any structures or other mechanisms intended to prevent pollution of stormwater or to remove pollutants from stormwater.	ABC Coke's BMP Plan did not have a diagram identifying and showing the locations of all structurual controls utilized at the Facility. Also, there was no description concerning the design, operation, and maintenance of the check dams, catch basin, retention pond and the sprinkler system.
Part IV.B.2.k – The BMP Plan requires control to prevent or control pollution of stormwater by soil particles to receiving waters.	ABC Coke's BMP Plan did not evaluate nor assess whether perimeter erosion and sediment control measures are needed to prevent or minimize off-site sediment runoff. As part of good housekeeping practices, the Facility utilized a street sweeper to removed particles off the ground. The frequency and the nature of this sweeping operation need to be detailed in the BMP Plan.

PERMIT REQUIREMENTS	PERMIT AND BMP PLAN DEFICIENCIES
Part IV.B.2.m – The BMP Plan should provide spill control sufficient to prevent or minimize contaminated stormwater runoff. The containment system shall be capable of retaining a volume equal to 110 percent of the capacity of the largest tank for which containment is provided.	ABC Coke's BMP Plan (pages 18- 20) did have some discussion on the capacity of its tanks and containment capacity. However, not all 17 sources have details on the storage and containment capacity. ABC Coke needs to evaluate their existing containment system and state in the BPM Plan whether all 17 potential pollution sources meet the 110 percent containment requirement.
Part IV.B.5.c – ABC Coke shall provide training for all personnel that implement the BMP Plan.	ABC Coke's BMP Plan (page 29) has discussion on the training of oil handling employees. For employees that implement the BMP Plan, no discussion was provided on who will be trained, the training frequency or the topics covered.

C. Records/Reports

Records and reports were evaluated to ensure that all inspection procedures and record keeping protocols were followed in accordance with the Permit condition and BMP Plan requirements.

Part IV.B.2.g of the Permit requires routine inspections of any structures that function to prevent stormwater pollution or to remove pollutants from stormwater and of the facility in general to ensure that the BMP is continually implemented and effective. Facility personnel stated that they conduct a daily and monthly inspection of the Facility. A daily safety/housekeeping inspection mainly consists of a quick visual inspection of potential pollution areas. However, records of these daily inspections were not documented in the file. A monthly routine inspection focuses on all potential pollution sources and any preventative maintenance issues. A monthly checklist form (see Exhibit No. 6 BMP Plan) is filled out during the inspection and maintained in the office. Based on the record review, the EPA has the following comments:

1. Records of each inspection and sampling event shall be maintained at the facility with the BMP Plan for a period of not less than three years as outlined in Part VI. F. of the BMP Plan. The EPA recommends daily inspections should document any spills, leaks and any deficiencies and be maintained with the BMP inspection and sampling records.

2. The monthly checklist form only includes the 17 potential pollution sources, primarily involving storage tanks that were inspected on a routine basis. The Facility also has structural BMP controls such as rock check dams, stormwater catch basin, retention pond, sprinkling system, and street sweeper. However,

none of these BMP controls were included or documented as part of the routine monthly inspections.

D. Site Evaluation and BMP Plan Implementation

A walkthrough of the Facility was conducted on August 15 and 16, 2012, focusing on industrial activities, material storage areas, stormwater pollutant sources and on the adequacy of BMP Plan implementation. The Facility's BMP Plan identified one industrial storage area and four material storage tanks as potential pollution sources to the on-site stormwater collection system which discharge to Five Mile Creek via Outfall 002. These sources are identified as nos. 8, 9, 10, 14, and 17. The other twelve sources (nos. 1, 2, 3, 4, 5, 6, 7, 11, 12, 13, 15, and 16) have containment or drainage structures that route the stormwater to the Facility's wastewater treatment process and discharge to Five Mile Creek via Outfall 001. Therefore, the stormwater portion of this site evaluation will focus only on the five sources that discharge to the stormwater collection and treatment system.

1. Coal Yard Storage (source no. 17) – The Facility has three coal yard storage areas. These coal yard storage areas are located to the West of the Facility's industrial, production and process areas. The coal yards are sloped where stormwater runoff drains into an on-site stormwater collection ditch (see Photos 9 and10). A series of check dams (see Photos 11and12) were installed along the ditch to reduce volume and velocity of stormwater flow to the stormwater catch basin. The stormwater catch basin is designed to settle the heavier coal fines and solids. It is also equipped with floating booms to skim off any oily residue from the surface. The catch basin discharges into a retention pond for final treatment (see Photo 13). The retention pond is designed with two rows of floating booms, a filter fabric and sand filter dams to improve treatment performance and further settling. The Facility personnel stated the retention pond is cleaned out every seven years or when solids reached five feet deep. This maintenance procedure should be stated in the BMP Plan. Also, a proactive approach was implemented recently that resulted in reducing the coal yard lost mainly from runoff and other sources from 3 percent down to 1 percent (a reduction of one million ton of coal).

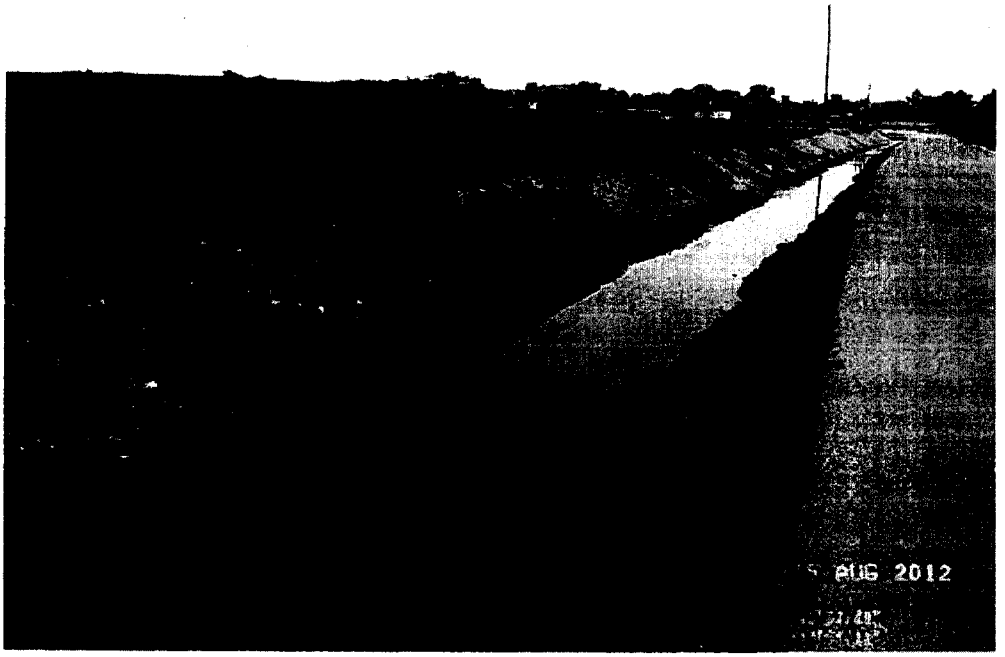


Photo 9 – SW Collection ditch around coal piles

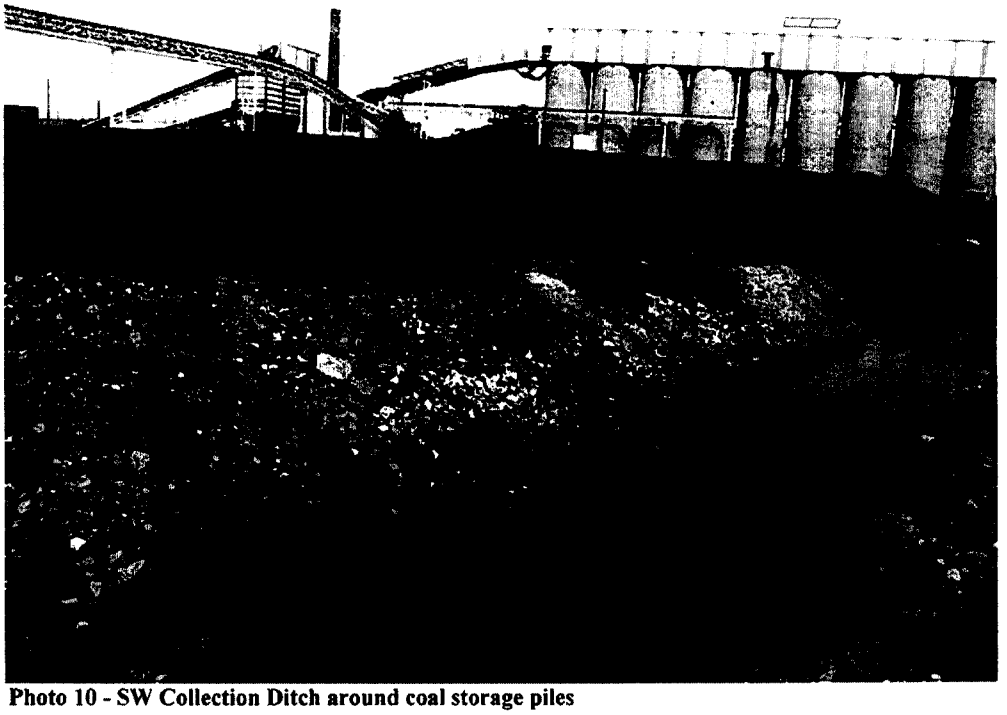


Photo 10 - SW Collection Ditch around coal storage piles

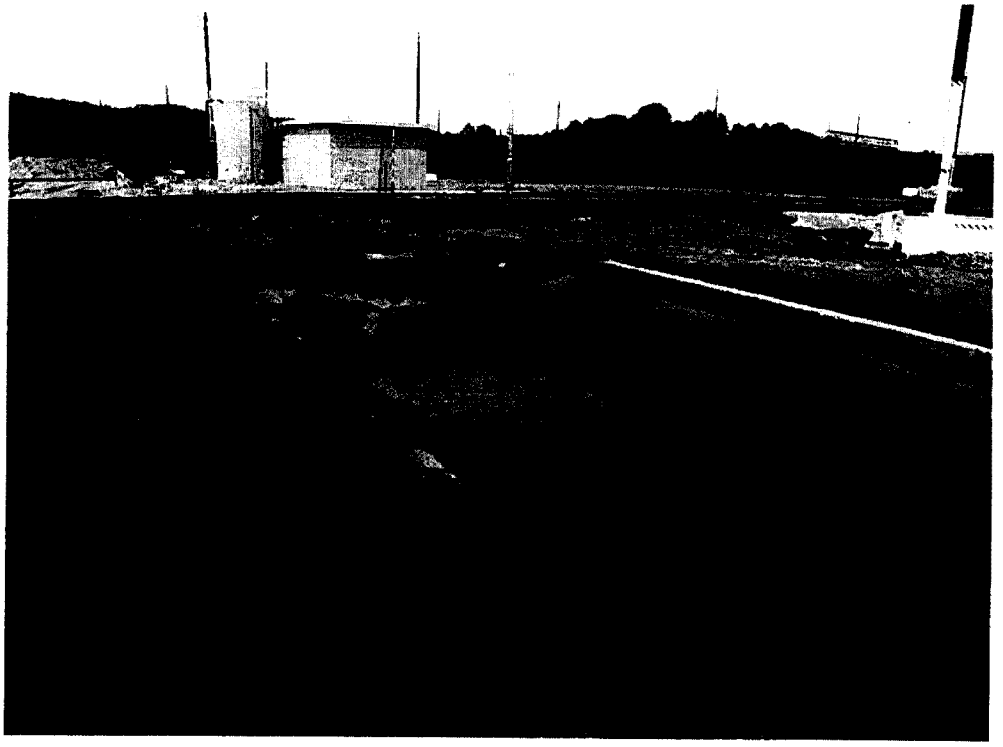


Photo 11 – Concrete block check dam SW control in collection ditch

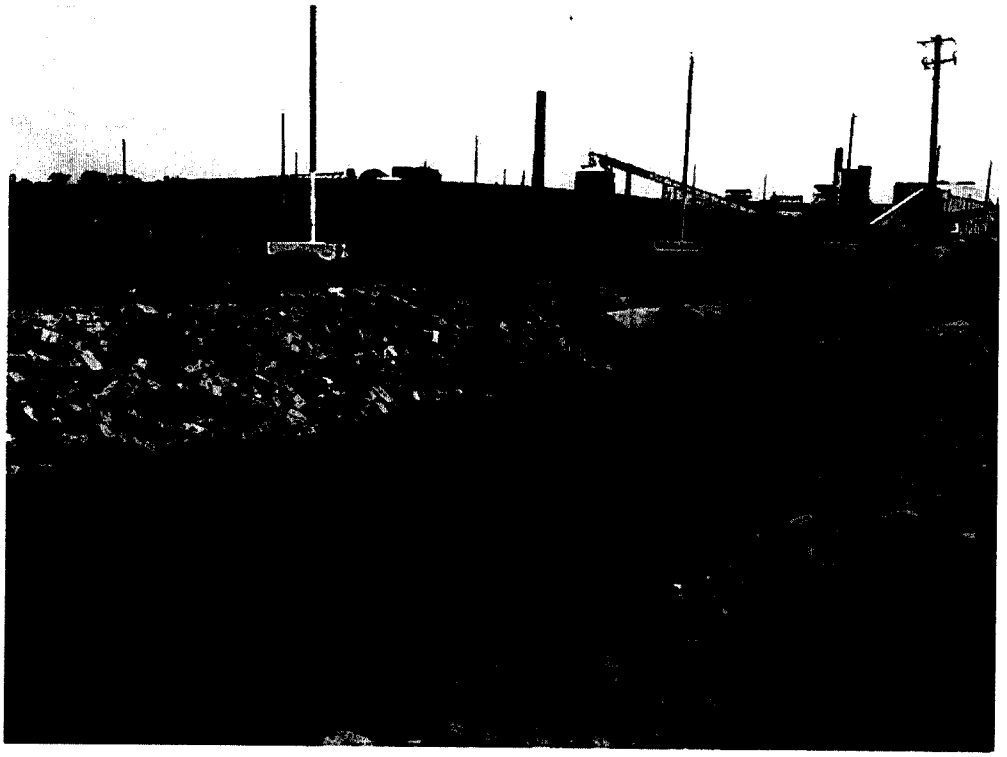


Photo 12 - Check dam in sw collection ditch

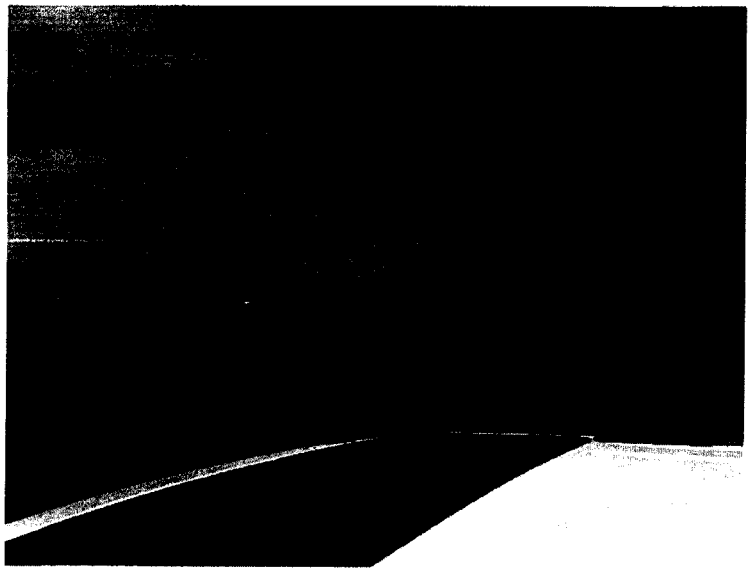
Photo 13 - SW final treatment pond

2. Gasoline Tank (source no. 8), Emergency Diesel Tank (source no. 9), Refractory Tank (source no. 10), and Lid Seal Tank Oven (source no. 14) – Of these four material storage tanks only the gasoline and diesel tanks have secondary containment. The BMP Plan stated that any spill as well as any overflow from the secondary containment area would be routed to the stormwater collection system. Any spill of chemicals that mixed with stormwater is considered to be a process wastewater and needs to be treated as process wastewater and not as stormwater. With regard to the refractory and the lid seal tanks, no secondary containment is noted in the BMP Plan. Therefore, any spill would go untreated to the stormwater collection system. The BMP Plan states that the combination of the catch basin and the stormwater retention pond has sufficient volume to retain the capacity of the largest oil container at the Facility. However, the BMP Plan failed to state if such a spill ever occurred, what would be the final disposal method for the spill material in the catch basin and the stormwater retention pond. As stated in Part I of the NPDES permit, only stormwater runoff from the coal yard can be discharged from Outfall 002. Finally, source no. 9 is listed as kerosene tank in the BMP Plan. However, it is listed as diesel generator fuel tanks in the monthly SPCC inspection checklist. Please address this discrepancy between these two documents.

3. Other industrial sources that contributed to the stormwater collection system which are not identified in the BMP Plan and the Permit – Coke Yard, Cooling Water

Blow down, Pulverized Coal in the Coal Bending Building, Coke Truck Quenching Area, and Jefferson County Industrial Water.

a. The coke yard storage areas are another source that contributed to stormwater runoff. However, one of the coke yard sources next to the retention pond was mislabeled as a coal yard in the Facility's site map (see Photo No. 14). Another coke yard south of it was not noted at all in the site map (see Photo No. 15). The site map and the BMP Plan should be modified to identify, evaluate, and address runoff from the coke storage areas.



'hoto 14 -Coke yard next to retention pond

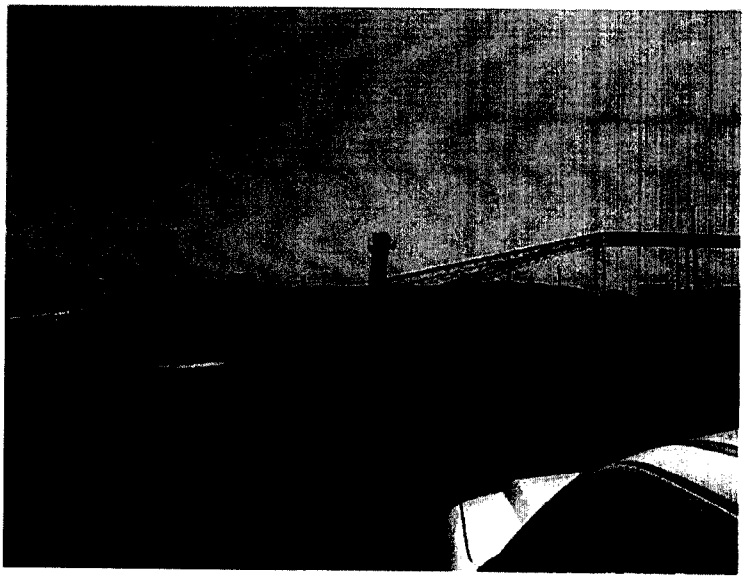


Photo 15 - Coke yard

b. During the inspection, the Facility's representative stated that some of the flow observed in the stormwater collection ditch is generated from the cooling water blow down (see Photo No.16). This cooling water blow down is not identified specifically in the description of discharge to Outfall 002 in Part I of the permit (page 7 of the NPDES permit).

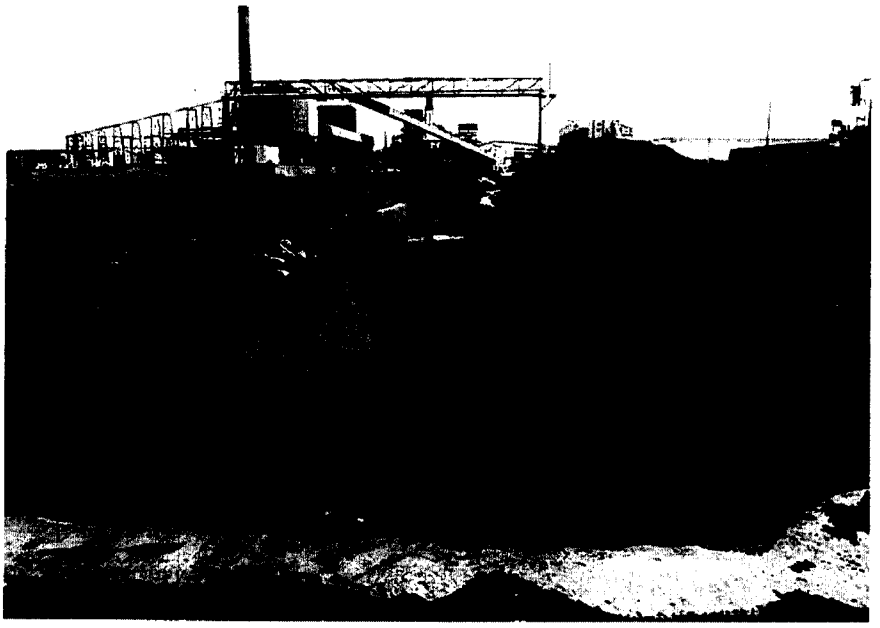


Photo 16 - Cooling water blow down in SW ditch

c. At the coal blending building, the EPA inspectors observed pulverized coal being washed directly by several stationary fire hoses into the stormwater collection system (see Photos No.17-19). This process water with pulverized coal is not identified specifically in the description of discharge to Outfall 002 in Part I of the permit (page 7 of the NPDES permit).

Photo 17 – One of three water hoses flushing pulverized coal out of the building

Photo 18 – Process water with pulverized material discharging from building

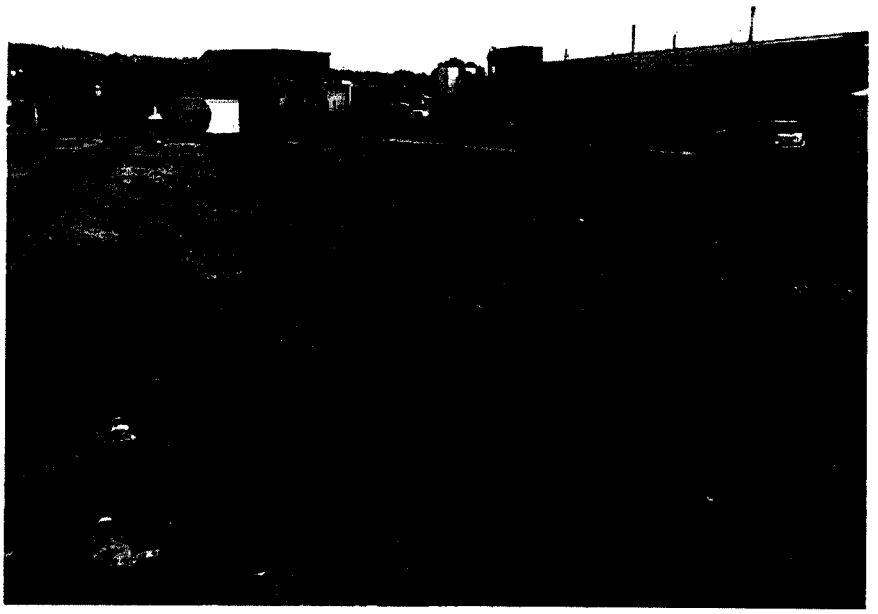


Photo 19 - Process water from coal blending area draining to SW collection ditch

d. At the coke truck quenching area, water was observed spraying on top of a loaded truck. This cooling water was allowed to drip off the trucks and drain directly into the stormwater collection system (see Photo No. 20 &21). This quench water source is not identified specifically in the description of discharge to Outfall 002 in Part I of the permit (page 7 of the NPDES permit).

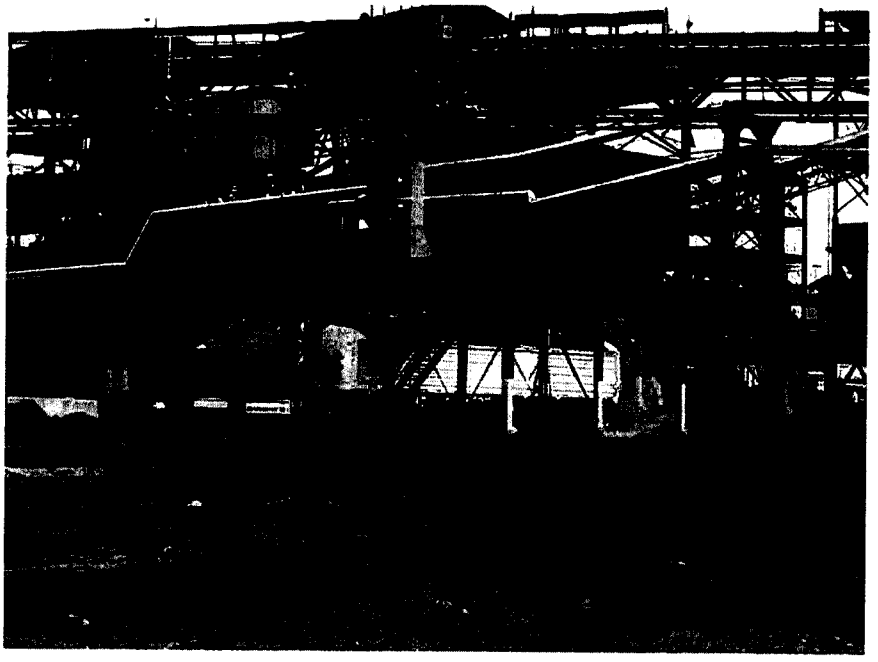


Photo 20 - Coke Quenching Area

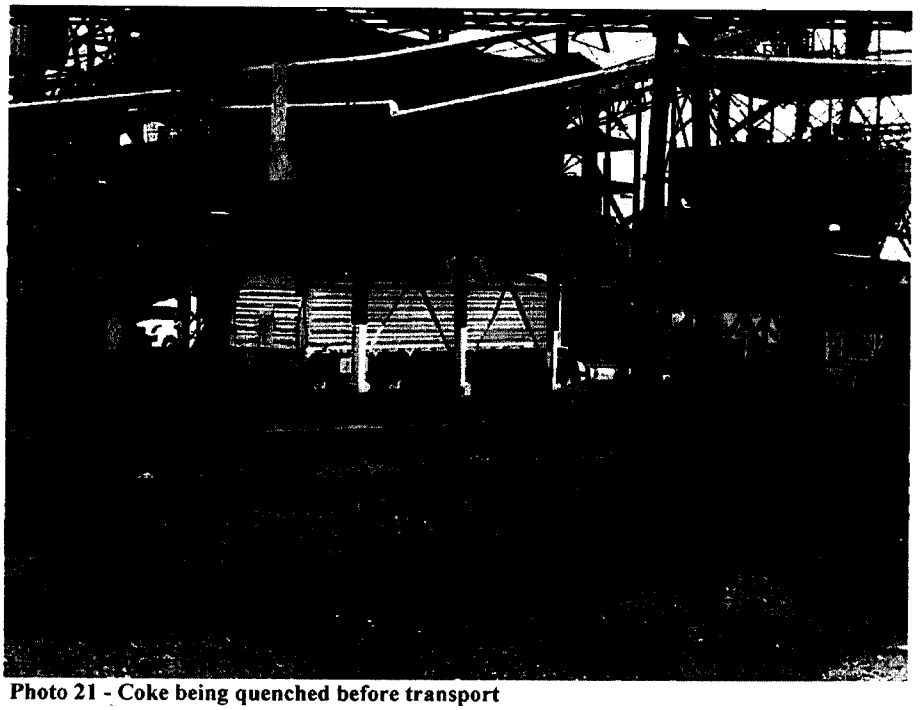


Photo 21 - Coke being quenched before transport

e. At the head of the stormwater collection ditch, a portable pump was used to pump out water that is leaking from a Jefferson County's industrial water line (see Photo No. 22 & 23). This water source is not identified specifically in the description of discharge to Outfall 002 in Part I of the permit (page 7 of the NPDES permit).

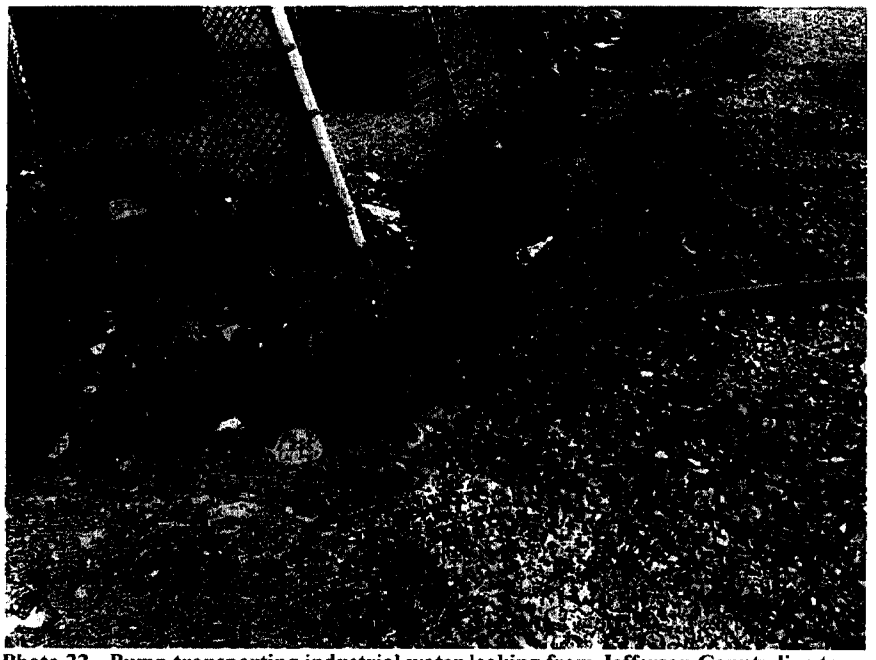


Photo 22 - Pump transporting industrial water leaking from Jefferson County line to SW collection ditch

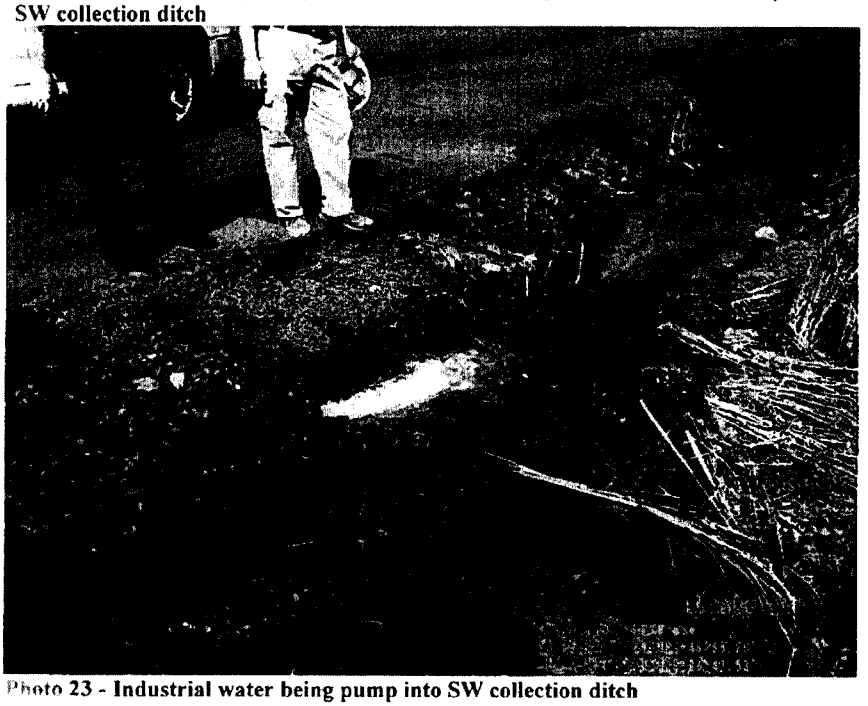


Photo 23 - Industrial water being pump into SW collection ditch

The Facility's site map and BMP Plan need to be revised to address the coke yard storage runoff. With regard to the cooling water blowdown, coal bending wash water, coke truck quenching water, and the industrial water, these four non-stormwater and process wastewater sources are not listed in the permit as authorized discharges to the stormwater treatment system. The Facility needs to

evaluate whether the stormwater treatment system (catch basin and retention pond) has adequate treatment capacity to handle the flow volume and pollutants from these unauthorized discharges. Also, the Facility is required to apply for a permit modification is needed in order if it plans to continue discharge from these four unauthorized sources into the stormwater treatment system.

4. Along the coal yard storage areas, a system of sprinklers is used for dust control. The Facility's representative stated that the sprinkler system operates on an average of two times per day. Operation of spray volume is set to generate one tenth of rainfall every 30 minutes. The Facility is working on installing additional sprinklers at the coal storage areas located at the South side within one year. The site map and the BMP Plan should be modified to identify, evaluate, and address the operation and maintenance of the sprinkler system.

5. The Facility has a street sweeper as part of good housekeeping practices. During the inspection, the EPA inspectors did not observe issues with solid and fine material deposits on the ground surface. However, the effectiveness of the street sweeper in removing materials off the ground should be evaluated and documented during the routine monthly inspection. Also, EPA recommends the BMP plan include details on the final disposal methods of solid materials collected during the sweeping operation.

6. The Facility's retention pond is designed as a treatment system used to treat only stormwater runoff from the coal yard storage areas. In the permit fact sheet, the discharge from the retention pond through Outfall 002 is limited for a maximum of 120 hours after a rain event of 1/8 inch or greater. However, this stormwater discharge condition in the fact sheet is not specifically stated in the permit. Currently, the Facility is operating under the discharge condition as stated in the fact sheet. The Facility should work with ADEM to include the discharge condition in the fact sheet into the permit.

7. The outlet structure control at the retention pond maybe withdrawing water near the bottom of the pond. According to the Facility representative, the discharge pipe is set at an elevation around one to four feet from the bottom. Although not observed, because of the low elevation setting in the retention pond, the discharge pipe may be pulling sediment from the bottom with the discharge. The EPA recommends the Facility verify that the outlet structure in the retention pond is set at least four feet from the bottom.

ABC COKE
A DIVISION OF
DRUMMOND COMPANY, INC.

June 17, 2013

Certified Mail Return Receipt Requested #70111570000146367414

Ms. Alenda Johnson
Clean Water Enforcement Branch
Water Protection Division
USEPA
Region 4
Atlanta Federal Center
61 Forsyth Street
Atlanta, Georgia 30303-8960

Re: The Letter of Concern dated
May 10, 2013 for the Compliance
Evaluation Inspection of the
NPDES Permit No. AL0003417

Dear Ms. Johnson:

The Four concerns listed in the Cover Letter for the Compliance Evaluation Inspection Report will be addressed with the analysis and corrections of the Report as we proceed.

COMPLIANCE INSPECTION REPORT

Page 1 – Part I – The first sentence should read "ABC Coke is classified under SIC Code 3312 for its Coke and By-Product manufacturing" as opposed to "manufacturing of inorganic petroleum catalysts."

Page 8 – Number 7 – The first sentence should read "The facility has four sand filters and four GAC columns operating in series "as opposed to "operating in parallel."

Page 9 – Part A – Document Reviews and Analysis:

No. 1 Discharge Monitoring Report Data Analysis

Table 1 indicates 2 violations for Ammonia (as N) + Unionized Ammonia at 001 Outfall during the January 31, 2010 reporting period.

Using the same Data Base (ICIS) and a fresh download, the exceedance numbers provided in your letter for Daily Max and Monthly Average (52.6 lbs/day) does not exist anywhere for any parameter. The numbers that do exists - 0.7 lbs/day for the monthly average and 0.9 lbs/day for Daily Max are orders of magnitude below the Permit Limits.

Please see attached documentation or you may acquire this DATA at ICIS.

Page 10 - Deficiencies of Contract Laboratory

No. 1 Analytical Methods :

The methods previously used by ABC Coke for Iron and Manganese (SW6010B, Benzo(a)Pyrene (SW8270C), and for Benzene and Naphthalene (SW8260C), are from the EPA's SW-846 test method directory. Quoting from the SW8270C under 1.0 Scope and Application, section 1.1: "This method is used to determine the concentration of semivolatile organic compounds in extracts prepared from many types of solid waste matrices, soils, air sampling media and **water samples."**

It was our understanding that these methods were applicable for wastewater analysis. After the EPA inspection in August of 2012, and the subsequent debriefing, we have switched all of our methods to comply exactly with 40 CFR Part 135.3(a).

The following methods are now in use:

Iron and Manganese – E200.7
Benzo(a)Pyrene and Naphthalene – E625
Benzene – E624

No. 2 Preservation Methods:

The chain of custody does note that the Iron and Manganese samples are preserved with nitric acid. Upon arrival at the laboratory, prior to analysis, the pH was checked and documented to be 2 or less. This documentation is part of the final report from the laboratory.

To address EPA's concern, the Chain of Custody has been modified. A place has been added to indicate whether or not the pH was checked at the time the samples left ABC Coke's property en route to the 3rd party laboratory.

Alabama Department of Environmental Management Discharge Monitoring Report *(DMR)*

PERMITTEE NAME: Drummond Company Inc
MAILING ADDRESS: DRUMMOND COMPANY INC, Birmingham, AL 35202-0246
FACILITY: Abc Coke Div Drummond Co Inc
LOCATION: RAILROAD ST, Birmingham, AL 35202-0246

PERMIT NUMBER: *AL0003417*
MONITORING POINT: 0011
COUNTY: Jefferson
Monitoring Period : 2010-01-01 To: 2010-01-31
NO DISCHARGE FROM SITE: ( )

Parameter		Quantity or Loading		Units	Quality or Concentration			Units	No. Ex.	Frequency of Analysis	Sample Type
		Average	Maximum		Minimum	Average	Maximum				
TOXICITY, PIMEPHALES CHRONIC	Sample Measurement	*****	0	9A pass (0)/fail(1)	*****	*****	*****		0	Monthly	Grab
PARAM CODE: 61428 Stage Code: 1 Final Effluent	Permit Requirement	*****	0 Maximum Daily		*****	*****	*****			Monthly	Grab
AMMONIA (AS N) + UNIONIZED AMMONIA	Sample Measurement	0.7	0.9	26 lbs/day	*****	*****	*****		0	Weekly	Composite
PARAM CODE: 61574 Stage Code: 1 Final Effluent	Permit Requirement	33.1 Monthly Average	52.4 Maximum Daily		*****	*****	*****			Weekly	Composite
SOLIDS, TOTAL DISSOLVED	Sample Measurement	*****	3362	26 lbs/day	*****	*****	*****		0	Monthly	Composite
PARAM CODE: 70295 Stage Code: 1 Final Effluent	Permit Requirement	*****	REPORT Maximum Daily		*****	*****	*****			Monthly	Composite
BOD, CARBONACEOUS 05 DAY, 20C	Sample Measurement	3.8	7.0	26 lbs/day	*****	*****	*****		0	Weekly	Composite
PARAM CODE: 80082 Stage Code: 1 Final Effluent	Permit Requirement	213 Monthly Average	320 Maximum Daily		*****	*****	*****			Weekly	Composite

Name/Title of Principal Executive Officer Or Authorized Agent	I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. §1319 (Penalties under these statutes may include fines up to $10,000 and/or maximum imprisonment of between 6 months up 5 years.)	Signature of Principal Executive Officer Or Authorized Agent	Telephone No	Date (MM/DD/YY)

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

Page 3

Alabama Department of Environmental Management Discharge Monitoring Report *(DMR)*

PERMITTEE NAME: Drummond Company Inc
MAILING ADDRESS: DRUMMOND COMPANY INC, Birmingham, AL 35202-0246
FACILITY: Abc Coke Div Drummond Co Inc
LOCATION: RAILROAD ST, Birmingham, AL 35202-0246

PERMIT NUMBER: *AL0003417*
MONITORING POINT: 0021
COUNTY: Jefferson
Monitoring Period : 2010-01-01 To: 2010-01-31
NO DISCHARGE FROM SITE: ( )

Parameter		Quantity or Loading Average	Quantity or Loading Maximum	Units	Quality or Concentration Minimum	Quality or Concentration Average	Quality or Concentration Maximum	Units	No. Ex.	Frequency of Analysis	Sample Type
BENZO(A)PYRENE PARAM CODE: 34247 Stage Code: 1 Final Effluent	Sample Measurement	*****	0.0	26 lbs/day	*****	*****	*****		0	Monthly	Grab
	Permit Requirement	*****	REPORT Maximum Daily		*****	*****	*****			Monthly	Grab
NAPHTHALENE PARAM CODE: 34696 Stage Code: 1 Final Effluent	Sample Measurement	*****	0.0	26 lbs/day	*****	*****	*****		0	Monthly	Grab
	Permit Requirement	*****	REPORT Maximum Daily		*****	*****	*****			Monthly	Grab
PHENOLS PARAM CODE: 46000 Stage Code: 1 Final Effluent	Sample Measurement	*****	0.0	26 lbs/day	*****	*****	*****		0	Monthly	Grab
	Permit Requirement	*****	REPORT Maximum Daily		*****	*****	*****			Monthly	Grab
FLOW, IN CONDUIT OR THRU TREATMENT PLANT PARAM CODE: 50050 Stage Code: 1 Final Effluent	Sample Measurement	0.852	0.960	03 MGD	*****	*****	*****		0	Daily	Calculated
	Permit Requirement	REPORT Monthly Average	REPORT Maximum Daily		*****	*****	*****			Daily	Calculated
AMMONIA (AS N) + UNIONIZED AMMONIA PARAM CODE: 61574 Stage Code: 1 Final Effluent	Sample Measurement	28.4	83.30	26 lbs/day	*****	*****	*****		0	Weekly	Grab
	Permit Requirement	REPORT Monthly Average	REPORT Maximum Daily		*****	*****	*****			Weekly	Grab

Name/Title of Principal Executive Officer Or Authorized Agent	I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. §1319 (Penalties under these statutes now include fines up to $10,000 and or maximum imprisonment of between 6 months to 5 years.)	Signature of Principal Executive Officer Or Authorized Agent	Telephone No	Date (MM/DD/YY)

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

ADEM DISCHARGE MONITORING REPORT

Company: ABC Coke Division
Eff: 4-1-09 EXP: 03-31-2014 LOCATION: TARRANT
DSN001 (AL0003417) MAJOR

MONTH: January 2010

PARAM	FLOW	pH	CBOD5	TSS	O&G	NH3-N	TKN	D O	CN,a	CN,T	B(A)P	Phenols	NAPH	Mn,T	Fe,T	P,T	N3 & N2	TDS	TOX
MIN		6.0						5.0				(4AAP)							
MAX	MONITOR	9.0	320	513	37.5	52.4	348		0.475	26.11	0.0024	0.38	0.15	10	15	Monitor	Monitor	Monitor	
AVG	MONITOR		213	342	25.0	33.1	232		0.145	18.27	0.0012	0.17	0.15	5	7.5				
FREQ	DAILY	DAILY	WKLY	WKLY	2XMNTHLY	WKLY	WKLY	WKLY	2XMNTLY	2XMNTHLY	WKLY	2XMNTHLY	MONTHLY	MONTHLY	MONTHLY	Qrtly	Qrtly	MONTHLY	MONTHLY
UNITS	MGD	S.U.	ppd	ppd	ppd	ppd	ppd	mgl	ppd	ppd	ppd	ppd	ppd	ppd	ppd	ppd	ppd	ppd	Pass/Fail
1	.20881	7.7																	
3	.30882	7.8																	
5	.24988	7.5																	
7	.33484	7.5	0															3362.00	
9	.26598	7.5																	
11	.28386	7.2						11.8											
13	.27194	6.8	3	3		0.9	0.0		0.016	3.16	0.00	0.000							
15	.40583	6.8																	
17	.30225	7.3																	
19	.28587	7.5																	
21	.28489	7.8																	
23	.27989	7.9																	
25	.34297	7.8						10.3	0.023	2.98		0.000							
27	.34397	7.8	7	4		0.6	4.9				0.00								
29	.32489	7.7																	
31	.29702	7.7																	
MAX	.40583	7.9	7.0	6.0	0.0	0.9	4.9	12.7	0.023	3.16	0.0	0.0	0.0	0.0	1.9	0.5	52.6	3362.0	PASS
AVG	.30122		3.5	4.8	0.0	0.7	3.5		0.020	3.07	0.0	0.000	0.0	0.0	1.9	0.5	52.6		PASS
MIN		6.8						9.8											

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations

Signature of Responsible Official _____ Date: _____

Alabama Department of Environmental Management Discharge Monitoring Report *(DMR)*

PERMITTEE NAME: Drummond Company Inc
MAILING ADDRESS: DRUMMOND COMPANY INC, Birmingham, AL 35202-0246
FACILITY: Abc Coke Div Drummond Co Inc
LOCATION: RAILROAD ST, Birmingham, AL 35202-0246

PERMIT NUMBER: *AL0003417*
MONITORING POINT: 0011
COUNTY: Jefferson
Monitoring Period : 2010-01-01 To: 2010-01-31
NO DISCHARGE FROM SITE: ( )

Parameter		Quantity or Loading Average	Quantity or Loading Maximum	Units	Quality or Concentration Minimum	Quality or Concentration Average	Quality or Concentration Maximum	Units	No. Ex.	Frequency of Analysis	Sample Type
OXYGEN, DISSOLVED (DO) PARAM CODE: 00300 Stage Code: 1 Final Effluent	Sample Measurement	*****	*****		9.8	*****	*****	19 mg/l	0	Weekly	Grab
	Permit Requirement	*****	*****		6.0 Minimum Daily	*****	*****			Weekly	Grab
PH PARAM CODE: 00400 Stage Code: 1 Final Effluent	Sample Measurement	*****	*****		6.8	*****	7.9	12 S.U.	0	Daily	Grab
	Permit Requirement	*****	*****		6.0 Minimum Daily	*****	9.0 Maximum Daily			Daily	Grab
SOLIDS, TOTAL SUSPENDED PARAM CODE: 00530 Stage Code: 1 Final Effluent	Sample Measurement	4.8	6.0	26 lbs/day	*****	*****	*****		0	Weekly	Composite
	Permit Requirement	342 Monthly Average	513 Maximum Daily		*****	*****	*****			Weekly	Composite
NITROGEN, KJELDAHL TOTAL (AS N) PARAM CODE: 00625 Stage Code: 1 Final Effluent	Sample Measurement	3.5	4.9	26 lbs/day	*****	*****	*****		0	Weekly	Composite
	Permit Requirement	232 Monthly Average	348 Maximum Daily		*****	*****	*****			Weekly	Composite
CYANIDE, TOTAL (AS CN) PARAM CODE: 00720 Stage Code: 1 Final Effluent	Sample Measurement	3.07	3.16	26 lbs/day	*****	*****	*****		0	2X Monthly	Grab
	Permit Requirement	18.27 Monthly Average	26.11 Maximum Daily		*****	*****	*****			2X Monthly	Grab
IRON, TOTAL (AS FE) PARAM CODE: 01045 Stage Code: 1 Final Effluent	Sample Measurement	1.9	1.9	26 lbs/day	*****	*****	*****		0	Monthly	Composite
	Permit Requirement	7.5 Monthly Average	15.0 Maximum Daily		*****	*****	*****			Monthly	Composite
MANGANESE, TOTAL (AS MN) PARAM CODE: 01055 Stage Code: 1 Final Effluent	Sample Measurement	0.0	0.0	26 lbs/day	*****	*****	*****		0	Monthly	Composite
	Permit Requirement	5.0 Monthly Average	10 Maximum Daily		*****	*****	*****			Monthly	Composite

Name/Title of Principal Executive Officer Or Authorized Agent	I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. §1319 Penalties under these statutes may include fines up to $10,000 and or maximum imprisonment of between 6 months to 5 years.)	Signature of Principal Executive Officer Or Authorized Agent	Telephone No	Date (MM/DD/YY)

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

Alabama Department of Environmental Management Discharge Monitoring Report *(DMR)*

PERMITTEE NAME: Drummond Company Inc
MAILING ADDRESS: DRUMMOND COMPANY INC Birmingham, AL 35202-0246
FACILITY: Abc Coke Div Drummond Co Inc
LOCATION: RAILROAD ST Birmingham, AL 35202-0246

PERMIT NUMBER: *AL0003417*
MONITORING POINT: 0011
COUNTY: Jefferson
Monitoring Period : 2010-01-01 To: 2010-01-31
NO DISCHARGE FROM SITE: ( )

Parameter		Quantity or Loading		Units	Quality or Concentration			Units	No. Ex.	Frequency of Analysis	Sample Type
		Average	Maximum		Minimum	Average	Maximum				
OIL AND GREASE	Sample Measurement	0.0	0.0	26 lbs/day	*****	*****	*****		0	2X Monthly	Grab
PARAM CODE: 03582 Stage Code: 1 Final Effluent	Permit Requirement	25.0 Monthly Average	37.5 Maximum Daily		*****	*****	*****			2X Monthly	Grab
BENZO(A)PYRENE	Sample Measurement	0.0	0.0	26 lbs/day	*****	*****	*****		0	Weekly	Composite
PARAM CODE: 34247 Stage Code: 1 Final Effluent	Permit Requirement	0.0012 Monthly Average	0.0024 Maximum Daily		*****	*****	*****			Weekly	Composite
NAPHTHALENE	Sample Measurement	0.0	0.0	26 lbs/day	*****	*****	*****		0	Monthly	Grab
PARAM CODE: 34696 Stage Code: 1 Final Effluent	Permit Requirement	0.15 Monthly Average	0.15 Maximum Daily		*****	*****	*****			Monthly	Grab
PHENOLS	Sample Measurement	0.0	0.0	26 lbs/day	*****	*****	*****		0	2X Monthly	Grab
PARAM CODE: 46000 Stage Code: 1 Final Effluent	Permit Requirement	0.17 Monthly Average	0.30 Maximum Daily		*****	*****	*****			2X Monthly	Grab
FLOW, IN CONDUIT OR THRU TREATMENT PLANT	Sample Measurement	.30122	.40563	03 MGD	*****	*****	*****		0	Daily	Totalizer
PARAM CODE: 50050 Stage Code: 1 Final Effluent	Permit Requirement	REPORT Monthly Average	REPORT Maximum Daily		*****	*****	*****			Daily	Totalizer
CYANIDE, FREE AVAILABLE	Sample Measurement	0.020	0.023	26 lbs/day	*****	*****	*****		0	2X Monthly	Grab
PARAM CODE: 51173 Stage Code: 1 Final Effluent	Permit Requirement	0.145 Monthly Average	0.475 Maximum Daily		*****	*****	*****			2X Monthly	Grab
TOXICITY, CERIODAPHNIA CHRONIC	Sample Measurement	*****	0	9A pass (0)/fail(1)	*****	*****	*****		0	Monthly	Grab
PARAM CODE: 61426 Stage Code: 1 Final Effluent	Permit Requirement	*****	0 Maximum Daily		*****	*****	*****			Monthly	Grab

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COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

Page 2

Alabama Department of Environmental Management Discharge Monitoring Report *(DMR)*

PERMITTEE NAME: Drummond Company Inc
MAILING ADDRESS: DRUMMOND COMPANY INC, Birmingham, AL 35202-0246
FACILITY: Abc Coke Div Drummond Co Inc
LOCATION: RAILROAD ST, Birmingham, AL 35202-0246
PERMIT NUMBER: *AL0003417*
MONITORING POINT: 0011
COUNTY: Jefferson
Monitoring Period : 2010-01-01 To: 2010-01-31
NO DISCHARGE FROM SITE: ( )

Parameter		Quantity or Loading		Units	Quality or Concentration			Units	No. Ex.	Frequency of Analysis	Sample Type
		Average	Maximum		Minimum	Average	Maximum				
TOXICITY, PIMEPHALES CHRONIC PARAM CODE: 61428 Stage Code: 1 Final Effluent	Sample Measurement	*****	0	9A pass (0)/fail(1)	*****	*****	*****		0	Monthly	Grab
	Permit Requirement	*****	0 Maximum Daily		*****	*****	*****			Monthly	Grab
AMMONIA (AS N) + UNIONIZED AMMONIA PARAM CODE: 61574 Stage Code: 1 Final Effluent	Sample Measurement	0.7	0.9	26 lbs/day	*****	*****	*****		0	Weekly	Composite
	Permit Requirement	33.1 Monthly Average	52.4 Maximum Daily		*****	*****	*****			Weekly	Composite
SOLIDS, TOTAL DISSOLVED PARAM CODE: 70295 Stage Code: 1 Final Effluent	Sample Measurement	*****	3362	26 lbs/day	*****	*****	*****		0	Monthly	Composite
	Permit Requirement	*****	REPORT Maximum Daily		*****	*****	*****			Monthly	Composite
BOD, CARBONACEOUS 05 DAY, 20C PARAM CODE: 80082 Stage Code: 1 Final Effluent	Sample Measurement	5.8	7.0	26 lbs/day	*****	*****	*****		0	Weekly	Composite
	Permit Requirement	213 Monthly Average	320 Maximum Daily		*****	*****	*****			Weekly	Composite

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COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

Alabama Department of Environmental Management Discharge Monitoring Report *(DMR)*

PERMITTEE NAME: Drummond Company Inc
MAILING ADDRESS: DRUMMOND COMPANY INC, Birmingham, AL 35202-0246
FACILITY: Abc Coke Div Drummond Co Inc
LOCATION: RAILROAD ST, Birmingham, AL 35202-0246

PERMIT NUMBER: *AL0003417*
MONITORING POINT: 0021
COUNTY: Jefferson
Monitoring Period : 2010-01-01 To: 2010-01-31
NO DISCHARGE FROM SITE: ( )

Parameter		Quantity or Loading		Units	Quality or Concentration			Units	No. Ex.	Frequency of Analysis	Sample Type
		Average	Maximum		Minimum	Average	Maximum				
PH PARAM CODE: 00400 Stage Code: 1 Final Effluent	Sample Measurement	*****	*****		7.3	*****	8.3	12 S.U.	0	Weekly	Grab
	Permit Requirement	*****	*****		6.0 Minimum Daily	*****	8.5 Maximum Daily			Weekly	Grab
SOLIDS, TOTAL SUSPENDED PARAM CODE: 00530 Stage Code: 1 Final Effluent	Sample Measurement	*****	*****		*****	22.3	48	19 mg/l	0	Weekly	Grab
	Permit Requirement	*****	*****		*****	35 Monthly Average	70 Maximum Daily			Weekly	Grab
CYANIDE, TOTAL (AS CN) PARAM CODE: 00720 Stage Code: 1 Final Effluent	Sample Measurement	*****	0.0	26 lbs/day	*****	*****	*****		0	Monthly	Grab
	Permit Requirement	*****	REPORT Maximum Daily		*****	*****	*****			Monthly	Grab
IRON, TOTAL (AS FE) PARAM CODE: 01045 Stage Code: 1 Final Effluent	Sample Measurement	*****	*****		*****	1.4	2.21	19 mg/l	0	2X Monthly	Grab
	Permit Requirement	*****	*****		*****	3.0 Monthly Average	6.0 Maximum Daily			2X Monthly	Grab
MANGANESE, TOTAL (AS MN) PARAM CODE: 01055 Stage Code: 1 Final Effluent	Sample Measurement	*****	*****		*****	155	170	19 mg/l	0	2X Monthly	Grab
	Permit Requirement	*****	*****		*****	2.0 Monthly Average	4.0 Maximum Daily			2X Monthly	Grab
OIL AND GREASE PARAM CODE: 03582 Stage Code: 1 Final Effluent	Sample Measurement	*****	*****		*****	0.0	0.0	19 mg/l	0	2X Monthly	Grab
	Permit Requirement	*****	*****		*****	10.0 Monthly Average	15.0 Maximum Daily			2X Monthly	Grab
BENZENE PARAM CODE: 34030 Stage Code: 1 Final Effluent	Sample Measurement	*****	0.0	26 lbs/day	*****	*****	*****		0	Monthly	Grab
	Permit Requirement	*****	REPORT Maximum Daily		*****	*****	*****			Monthly	Grab

Name/Title of Principal Executive Officer Or Authorized Agent	I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. §1319 (Penalties under these statutes may include fines up to $10,000 and or maximum imprisonment of between 6 months to 5 years.)	Signature of Principal Executive Officer Or Authorized Agent	Telephone No	Date (MM/DD/YY)

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

Alabama Department of Environmental Management Discharge Monitoring Report *(DMR)*

PERMITTEE NAME: Drummond Company Inc
MAILING ADDRESS: DRUMMOND COMPANY INC, Birmingham, AL 35202-0246
FACILITY: Abc Coke Div Drummond Co Inc
LOCATION: RAILROAD ST, Birmingham, AL 35202-0246

PERMIT NUMBER: *AL0003417*
MONITORING POINT: 0021
COUNTY: Jefferson
Monitoring Period : 2010-01-01 To: 2010-01-31
NO DISCHARGE FROM SITE: ( )

Parameter		Quantity or Loading		Units	Quality or Concentration			Units	No. Ex.	Frequency of Analysis	Sample Type
		Average	Maximum		Minimum	Average	Maximum				
BENZO(A)PYRENE PARAM CODE: 34247 Stage Code: 1 Final Effluent	Sample Measurement	*****	0.0	26 lbs/day	*****	*****	*****		0	Monthly	Grab
	Permit Requirement	*****	REPORT Maximum Daily		*****	*****	*****			Monthly	Grab
NAPHTHALENE PARAM CODE: 34696 Stage Code: 1 Final Effluent	Sample Measurement	*****	0.0	26 lbs/day	*****	*****	*****		0	Monthly	Grab
	Permit Requirement	*****	REPORT Maximum Daily		*****	*****	*****			Monthly	Grab
PHENOLS PARAM CODE: 46000 Stage Code: 1 Final Effluent	Sample Measurement	*****	0.0	26 lbs/day	*****	*****	*****		0	Monthly	Grab
	Permit Requirement	*****	REPORT Maximum Daily		*****	*****	*****			Monthly	Grab
FLOW, IN CONDUIT OR THRU TREATMENT PLANT PARAM CODE: 50050 Stage Code: 1 Final Effluent	Sample Measurement	0.852	0.960	03 MGD	*****	*****	*****		0	Daily	Calculated
	Permit Requirement	REPORT Monthly Average	REPORT Maximum Daily		*****	*****	*****			Daily	Calculated
AMMONIA (AS N) + UNIONIZED AMMONIA PARAM CODE: 61574 Stage Code: 1 Final Effluent	Sample Measurement	28.4	83.30	26 lbs/day	*****	*****	*****		0	Weekly	Grab
	Permit Requirement	REPORT Monthly Average	REPORT Maximum Daily		*****	*****	*****			Weekly	Grab

Name/Title of Principal Executive Officer Or Authorized Agent	I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. §1319 (Penalties under these statutes may include fines up to $10,000 and/or maximum imprisonment of between 6 months to 5 years.)	Signature of Principal Executive Officer Or Authorized Agent	Telephone No	Date (MM/DD/YY)

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

Compliance Evaluation Inspection – Pages 12&13

ABC Coke Municipal Wastewater Treatment and Stormwater Inspection, August 13-16, 2012

PERMIT REQUIREMENTS	PERMIT AND BMP DEFICIENCIES
1.	
Part IV.B.2.b – The BMP Plan requires ABC Coke to identify in a site map a Prediction of the direction of stormwater flow. Also, the BMP Plan should discuss the rate of such flow and the quantity of pollutants which could be discharged from the Facility.	The Facility's site map dated June 6, 1978, did not show the direction of stormwater throughout the Facility. Also, the BMP Plan has no discussion regarding rate of flow and the quantity of pollutants which could be discharged from the Facility.

Response:

Part IV.B.2.b of the permit reads as follows:

" Establish specific best management practices to meet the objectives identified under paragraph a. of this section, addressing each component or system capable of causing a release of significant amounts of pollutants to the waters of the State, and identifying specific preventative or remedial measures to be implemented;"

This was completed in the present BMP and can be found in Section III, page18 though 20 which discussed flows and direction; however, if the Authors were meaning **Part IV.B.2.a. 1** and **2** of the permit, **Part IV.B.2.a.1** reads:

"Each facility component or system shall be examined for its potential for causing a release of significant amount of pollutants to the waters of the State due to equipment failure, improper operation, natural phenomena such as rain or snowfall, etc."

This requirement was net in the present BMP Plan under Section III Page 18 through 20.

Part IV B.2.a.2. reads:

"Where experience indicates a reasonable potential for equipment failure (e.g., a tank overflow or leakage), natural condition (e.g. precipitation), or circumstances to result in significant amounts of pollutants reaching surface water, the plan should include a prediction of the direction, rate of flow, and

total quantity of pollutants which could be discharged from the facility as a result of each condition or circumstance."

With the extensive containment and back up pump systems in place (described and documented in the BMP Plan), the plant has no "experience which indicates a reasonable potential for failure." The Plant has not had a reportable spill during the 3 years prior to the present BMP Plan or during its effective dates. This is documented in the present BMP Plan on Page 11.

Since ABC Coke does not have "experiences of a spill and the USEPA's SPCC and BMP Guidance lists the flow directions as "Recommended" (page 6-2, V-I.O, 2005) in Facility Diagrams, the flows are not required; However, in the interest of clarity, we will provide the flow directions.

2.

Part IV.B.2.f – The BMP Plan should designate by position or name the person or persons responsible for day to day implementation of the BMP Plan.	ABC Coke's BMP Plan did not identify these individuals or describe each person's responsibilities for the direct implementation of the BMP Plan.

Part IV.B.2.f. reads - **"Designate by position or name or persons responsible for the day to day implementation of the BMP;"**

Response:

The requirement of the above was met with the listing of the Spill Response Team as listed in the BMP Plan on Page 24; However, in the new plan the listing will be identified in 2 locations for clarity.

3.

Part IV.B.2.k – The BMP Plan should include a diagram showing the locations of any structures or other mechanisms intended to prevent pollution of stormwater of to remove pollutants from stormwater.	ABC Coke's BMP Plan did not have a diagram identifying and showing the locations of all structural controls utilized at the Facility. Also, there was no description concerning the design, operation, and maintenance of the check dams, catch basin, retention pond and the sprinkler system.

Part IV.B.2.k.reads – "Include a diagram of the facility showing the locations where storm water exits the facility, the locations of any structures or other mechanisms intended to prevent pollution of storm water or to remove pollutants from storm water, the locations of any collection and handling systems;

Response: Again referring to the USEPA's BMP Guidance and the SPCC Guidance, the structures are not required; However, the permit requires the location of some of the structural controls.

The new BMP will include the location of the controls required by the permit (See Attached).

4.

Part IV.B.2.k – The BMP Plan requires control to prevent control pollution of stormwater by soil particles to receiving waters.	ABC Coke's BMP Plan did not evaluate nor assess whether perimeter erosion and sediment control measures are needed to prevent or minimize off-site sediment runoff. As part of good housekeeping practices, the Facility utilized a street sweeper to remove particles off the ground. The frequency and the nature of this sweeping operation need to be detailed in the BMP Plan.

Response: The installation of 2800 feet of Barrier Wall on the North East Property Boundary and the Railroad Limiting the discharge on the Westside of the Property, which were observed and photographed on the inspection, preceding the formulation of the present BMP and the issuance of the present Permit precluded the need for an additional study to determine if additional controls are necessary as these are results of previous studies. The use of the Street Sweeper will be included in the new BMP Plan.

5.

Part IV.B.2.m - The BMP Plan should provide spill control sufficient to prevent or minimize contaminated stormwater runoff. The containment system shall be capable of retaining a volume equal to 110 percent of the capacity of the largest tank for which containment is provided.	ABC Coke's BMP Plan (pages 18-20) did have some discussion on the capacity of its tanks and containment capacity. However, not all 17 sources have details on the storage and containment capacity. ABC Coke needs to evaluate their existing containment system and state in the BMP Plan whether all 17 potential pollution sources meet the 110 percent containment requirement.

Response: As stated above, not all of the 17 Sources have or are required to have containment. Please see the attached listings which with some additions will be incorporated into the new BMP Plan required for the NPDES permit cycle.

Control and Containment Facilities

SOURCE	DESCRIPTION
Source 1	• Concrete secondary containment around Ammonia Liquor Storage Tanks has a capacity of approx. 192,000 gallons, interconnected with Coal Tar Storage Tanks (Source 2) containment which has a capacity of approx. 175,000 gallons, for total combined containment capacity of approx. 367,000 gallons, which exceeds 110% of the largest single storage container. • Containment contents pumped into the process unit, with any process wastewater directed to onsite wastewater treatment plant • Any oil passing through the process into the wastewater treatment plant is retained, as the wastewater treatment unit which is equipped to contain oil until it can be cleaned up. • Any overflow of containment would drain to facility's storm water collection system, sedimentation basin and storm water retention pond, both of which are equipped to contain oil until it can be cleaned up.
Source 2	• Concrete secondary containment around Coal Tar Storage Tanks has a capacity of approx. 175,000 gallons, interconnected with Ammonia Liquor Storage Tanks (Source 1) containment which has a capacity of approx. 192,000 gallons for total combined containment capacity of approx. 367,000 gallons, which exceeds 110% of the largest single storage container. • Containment contents pumped into the process unit with any process wastewater directed to onsite wastewater treatment plant. • Any oil passing through the process into the wastewater treatment plant is retained, as the wastewater treatment unit which is equipped to contain oil until it can be cleaned up. • Any overflow of containment would drain to facility's storm water collection system, sedimentation basin and storm water retention pond, both of which are equipped to contain oil until it can be cleaned up.
Source 3	• Concrete paved area surrounding Thickener Tank is sloped to an area drain which flows via gravity to the storm water collection system and concrete sedimentation basin ahead of the site retention basin and Outfall 002. The concrete sedimentation basin is calculated as capable of retaining 47,000 gallons of oil at a depth of one (1) foot, which exceeds 110% of the anticipated maximum oil volume in this storm water tank. • Any oil passing through the process into the wastewater treatment plant is retained, as the wastewater treatment unit which is equipped to contain oil until it can be cleaned up. • Any discharge would drain to facility's storm water collection system, sedimentation basin and storm water retention pond, both of which are equipped to contain oil until it can be cleaned up.
Source 4	• Concrete secondary containment around Ammonia Separator Tank drains to Byproduct process sumps and Byproduct Process Area containment, which exceed 110% of larges single container. • Tank N.I.S.; Containment unlikely to contribute pollutants to Byproduct process unit. • Any oil passing through the process into the wastewater treatment plant is retained, as the wastewater treatment unit which is equipped to contain oil until it can be cleaned up. • Any overflow of containment would drain to facility's storm water collection system, sedimentation basin and storm water retention pond, both of which are equipped to contain oil until it can be cleaned up.

SOURCE	DESCRIPTION
Source 5	• Concrete secondary containment around BTX Tanks has a capacity of approx. 97,000 gallons, which exceeds 110% of the largest single storage container. • Containment contents pumped into the process unit, with any process wastewater directed to onsite wastewater treatment plant • Any oil passing through the process into the wastewater treatment plant is retained, as the wastewater treatment unit which is equipped to contain oil until it can be cleaned up. • Any overflow of containment would drain to facility's storm water collection system, sedimentation basin and storm water retention pond, both of which are equipped to contain oil until it can be cleaned up.
Source 6	• Concrete sump underneath the BTX Tanker/Truck loading area has a capacity of approx. 97,000 gallons, which exceeds 110% of the largest single storage container. • Containment contents pumped into the process unit, with any process wastewater directed to onsite wastewater treatment plant • Any oil passing through the process into the wastewater treatment plant is retained, as the wastewater treatment unit which is equipped to contain oil until it can be cleaned up. • Any overflow of containment would drain to facility's storm water collection system, sedimentation basin and storm water retention pond, both of which are equipped to contain oil until it can be cleaned up.
Source 7	• Concrete secondary containment around the new and used wash oil tanks has a capacity of approx. 25,000 gallons, which exceeds 110% of the largest single storage container. • Concrete secondary containment around the caustic tanks has a capacity of approx. 30,000 gallons, which exceeds 110% of the largest single storage container. • Containment contents pumped into the process unit, with any process wastewater directed to onsite wastewater treatment plant. • Any oil passing through the process into the wastewater treatment plant is retained, as the wastewater treatment unit which is equipped to contain oil until it can be cleaned up. • Any overflow of containment would drain to facility's storm water collection system, sedimentation basin and storm water retention pond, both of which are equipped to contain oil until it can be cleaned up.
Source 8	• Concrete secondary containment around the Gasoline Tank has a capacity of approx. 1,500 gallons, which exceeds 110% of the largest single storage container. • Any overflow of containment would drain to facility's storm water collection system, sedimentation basin and storm water retention pond, both of which are equipped to contain oil until it can be cleaned up.
Source 9	• Concrete secondary containment around the Emergency Diesel Tank has a capacity of approx. 12,500 gallons, which exceeds 110% of the largest single storage container. • Containment contents drain into the process unit, with any process wastewater directed to onsite wastewater treatment plant • Any oil passing through the process into the wastewater treatment plant is retained, as the wastewater treatment unit which is equipped to contain oil until it can be cleaned up • Any overflow of containment would drain to facility's storm water collection system, sedimentation basin and storm water retention pond, both of which are equipped to contain oil until it can be cleaned up.
Source 10	• Refractory storage tanks located at end of ovens; release of refractory slurry is unlikely to migrate from the release area • Any flow from the release area would drain to facility's storm water collection system, sedimentation basin and storm water retention pond, both of which are equipped to contain oil until it can be cleaned up. Refractory product migrating from storage tank area would enter sedimentation basin, the capacity of which exceeds 110% of container volume.

SOURCE	DESCRIPTION
Source 11	• Concrete secondary containment around the Silo Diesel Tank has a capacity of approx. 8,800 gallons, which does not meet 110% containment criteria. • Containment contents pumped into the process unit, with any process wastewater directed to onsite wastewater treatment plant. • Sized secondary containment deemed impracticable due to proximity to heavy equipment haul road and process units. • Any fuel released to ground surface outside the containment would flow via diversion ditches to the sedimentation basin, which provides secondary containment capacity in excess of 110% of the container volume. • Any oil passing through the process into the wastewater treatment plant is retained, as the wastewater treatment unit which is equipped to contain oil until it can be cleaned up • Any overflow of containment would drain to facility's storm water collection system, sedimentation basin and storm water retention pond, both of which are equipped to contain oil until it can be cleaned up.
Source 12	• Concrete paved area sloped to a process drain and containment sump/pump system. • Containment contents pumped into the process unit. • Any discharge outside contained area would flow overland and diversion ditch to sedimentation basin, which provides containment in excess of 110% of largest single container. • Any oil passing through the process into the wastewater treatment plant is retained, as the wastewater treatment unit which is equipped to contain oil until it can be cleaned up • Any overflow of containment would drain to facility's storm water collection system, sedimentation basin and storm water retention pond, both of which are equipped to contain oil until it can be cleaned up.
Source 13	• Metal secondary containment surrounding the used oil tank has a capacity of approx. 800 gallons, which exceeds 110% of the largest single storage container. • Metal secondary containment surrounding the 500 and 1,000 gallon new oil tanks has a capacity of approx. 1,100 gallons, which equals 110% of the largest single storage container. • Metal secondary containment surrounding the other 500 and 1,000 gallon new oil tanks has a capacity of approx. 1,100 gallons, which equals 110% of the largest single storage container. • Located within a building with floor trenches that drain to locomotive sump/pump, which is pumped to the process unit. • Any fuel released to ground surface outside the containment would flow via diversion ditches to the sedimentation basin, which provides secondary containment capacity in excess of 110% of the container volume. • Any oil passing through the process into the wastewater treatment plant is retained, as the wastewater treatment unit which is equipped to contain oil until it can be cleaned up. • Any overflow of containment would drain to facility's storm water collection system, sedimentation basin and storm water retention pond, both of which are equipped to contain oil until it can be cleaned up.
Source 14	• Tanks containing refractory slurry used to seal ovens; no oil storage or use, release unlikely to migrate from release area • Any spillage of lid seal refractory, while unlikely due to site surfacing and grade, could drain to facility's storm water collection system, sedimentation basin and storm water retention pond. Refractory product migrating from storage tank area would enter sedimentation basin, the capacity of which exceeds 110% of container volume.

SOURCE	DESCRIPTION
Source 15	• Portable containers are stored on containment pallets, which exceed 110% of the largest single storage container, or within process areas that drain to the process sewer, which provides containment in excess of 110% of the largest single storage container. • Any oil passing through the process into the wastewater treatment plant is retained, as the wastewater treatment unit which is equipped to contain oil until it can be cleaned up. • Any overflow of containment would drain to facility's storm water collection system, sedimentation basin and storm water retention pond, both of which are equipped to contain oil until it can be cleaned up.
Source 16	• Process areas are contained and drain to the process sewer. Process area containment curbing and sumps/pumps provide hydraulic control of all potential releases within Byproducts area. • Activated sludge wastewater treatment plant serves entire Byproduct Process area, and is designed to remove solids as well as inorganics and organics by means of aeration, clarification, sedimentation, filtration and polishing. Waste sludge is pressed and returned to process as feedstock. • Any oil passing through the process into the wastewater treatment plant is retained, as the wastewater treatment unit which is equipped to contain oil until it can be cleaned up • Any overflow of containment would drain to facility's storm water collection system, sedimentation basin and storm water retention pond, both of which are equipped to contain oil until it can be cleaned up.
Source 17	• The coal/coke storage yard drains into perimeter drainage ditches which flow into the storm water sedimentation basin and the storm water retention basin. • Multiple rock check dams are located in the west perimeter ditch to retain solids; dams subject to periodic inspection and cleaning of accumulated solids • Dust suppression system used in storage yard. Operate dust suppression system on as needed basis, at controlled rate and duration • Flocculant (FeCl or other) addition to sedimentation basin discharge, prior to retention basin, as needed • Storm water retention basin provided with absorbent booms as well as filter dam, under or through which water must pass prior to discharge through manually actuated gate valve • Solids accumulation in sedimentation basin and retention pond subject to removal as needed; at a minimum, assess accumulated solids depth at least annually • Verify normally closed position of 20" double disc gate valve on outfall pipe from retention pond; return to closed position following controlled discharge event

Summary of Oil Storage Facilities

SOURCE NO.	TYPE	PRODUCT	CAPACITY (GALLONS)	CORROSION PROTECTION	SPILL POTENTIAL
2	AST	Coal Tar	174,000 230,000	Painted Steel	Low
3	AST	Oily wastewater	870,000 (est. oil < 10,000)	Painted Steel	Low
5	AST	BTX Light Oil	42,000 42,000	Painted Steel	Low
6	AST	Tanker Truck/car	2,500 ea.	SS/Painted Steel	Low
7	AST	Wash Oil	20,000 10,000	Painted Steel	Low
8	AST	Gasoline, Unleaded	1,000	Painted Steel	Low
9	AST	Diesel Fuel	8,245	Painted Steel	Low
11	ASt	Diesel Fuel	25,000	Painted Steel	Med
12	AST	Diesel Fuel	20,000 1,000	Painted Steel	Med
13	AST	New and used oil	3 @ 500 2 @ 1,000	Painted Steel	Low
15	IBC	Misc. Oil	55 gal drums 275 gal totes 500 gal port tank	Painted Steel	Low

(SEE EXHIBIT 4 FOR LOCATIONS)

6.

Part IV.B.5.c – ABC Coke shall provide training for all personnel that implement the BMP Plan.	ABC Coke's BMP Plan (page 29) has discussion on the training of oil handling employees. For employees that implement the BMP Plan, no discussion was provided on who will be trained, the training frequency or the topics covered.

Part IV.B.5.c. reads – "The permittee shall provide training for any personnel required to implement the BMP and shall retain documentation of such training at the facility. This documentation shall be available for inspection by representatives of the Department. Training shall be performed prior to the date that implementation of the BMP is required."

Response: The term "Oil handling employees is synonymous with Employees implementing the BMP Plan as the most stringent training relates to Oil and The SPCC Plan. As was explained to you during the inspection, all employees in the By-Products area are trained in the SPCC/BMP Plan during the required Hazmat Training. Instead of using the log as was denoted in the present BMP Plan. Individual Certificates were issued for the Training and a copy is retained on file. The Certificate file was shown to you during the inspection.

Page 13 under C-2

The monthly checklist form only includes the 17 potential pollution sources, primarily involving storage tanks that were inspected on a routine basis. The Facility also has structural BMP controls such as rock check dams, stormwater catch basin, retention pond, sprinkling system, and street sweeper. However, none of these BMP controls were included or documented as part of the routine monthly inspections.

Response:

Those controls identified will be added to the monthly inspection.

Page 17 under Item 2

Response:

The overflow from Secondary containment identified here in your letter, flows to a concrete Basin designed for contaminate trapping and removal of the 280,000 gallon capacity of the unit can accommodate any storage on the Plant.

The Refractory Tank and Lid Seal Tank identified in this Item do not contain chemicals or oils harmful to the environment. If leakage occurs, the area by natural gradient drain to the Quench Sump which requires constant makeup water.

Source no. 9 (Kerosene Tank) was removed from service.

Pages 17 through 22 under Item 3 addresses "unauthorized discharges to the Stormwater Collection System."

Response:

As you quoted above on Page 7 of the Permit, it is explained that "Descriptions are more fully explained in the Permit Application." Three of the "unauthorized discharges" identified in your letter. Cooling water blowdown, coal blending wash water, and coke truck loading quenching water are identified in the Permit Application on ADEM Form 187, "NPDES Application Supplemental Information," on Page 7 as "Miscellaneous Waste Water."

The fourth item, Jefferson County Industrial Water, is the only unauthorized source in the permit on Page 17 Item G "The discharge of wastewater, generated by any process, or by any other means is not under the operational control of the Permittee or not identified in the application for this permit is not authorized by the permit."

The industrial water leak which came from their facility on their right of way was repaired.

Page 23 under Item 4

Response:

The Sprinkler System area will be included on the Site Map.

Page 23 under Item 6

Response:

The 1st sentence in Item 6 is incorrect in that the size of the retention pond, not including the Concrete Basin prior to the Retention Pond, is designed to handle all surface runoff (coal storage, coke storage, and process area's prior to the addition of concrete containment as well as those additional waters identified previously and the coke production area.

The discussion in the closeout by all parties came to the consensus that not having the 120 hour discharge requirement in the permit would be better for the Environment.

Page 23 under Item 7

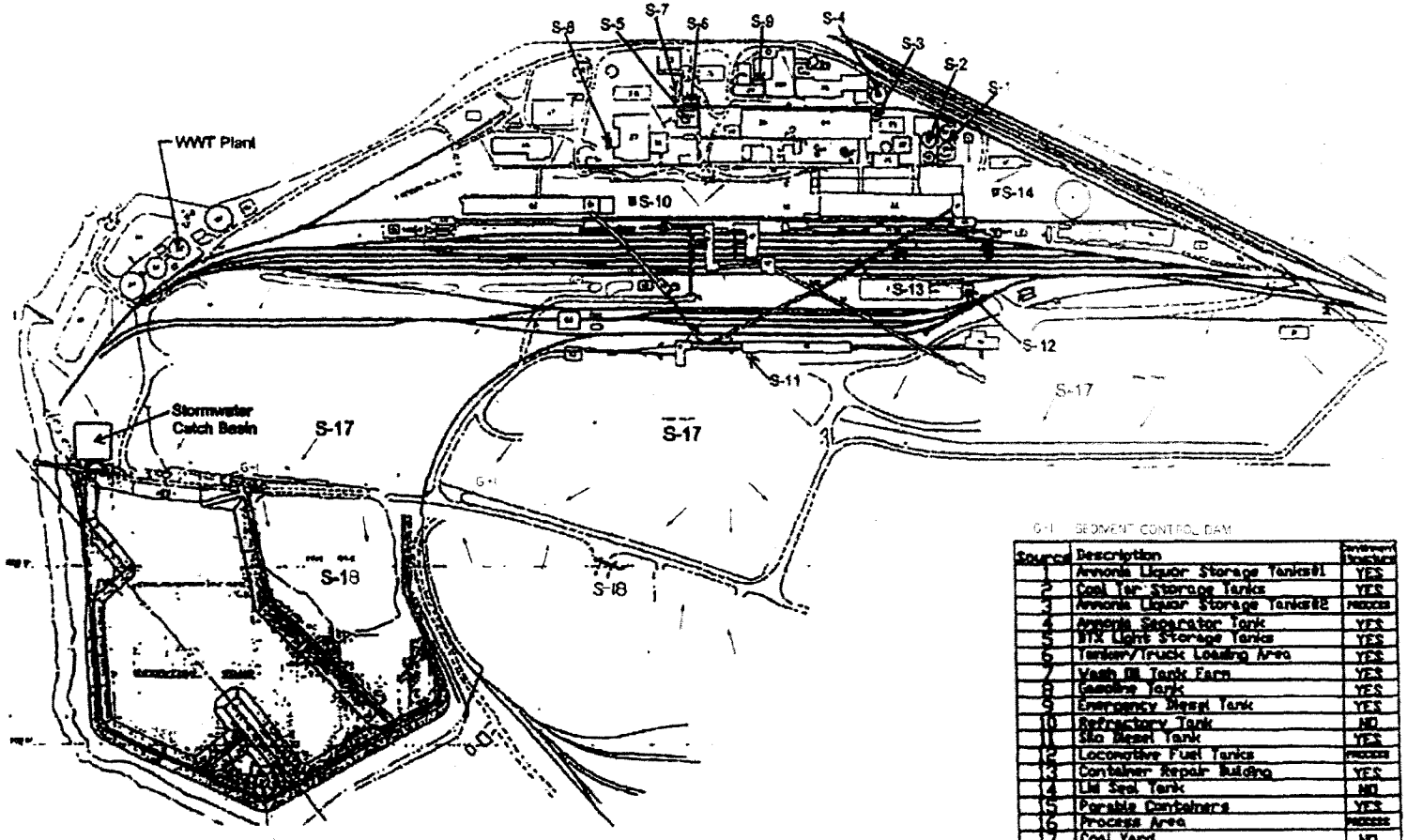
Response:

ABC Coke will investigate your recommendation relative to the outfall. The bottom of the discharge is 2 feet 2 inches off the bottom.

Sincerely,
Drummond Company, Inc.

W.M. Poling
Manager of Environmental & Engineering
ABC Coke

cc via e-mail: Daphne Smart, ADEM



G-1 SEDIMENT CONTROL DAM

Source	Description	Environmental Significance
1	Ammonia Liquor Storage Tanks#1	YES
2	Coal Tar Storage Tanks	YES
3	Ammonia Liquor Storage Tanks#2	PROCESS
4	Ammonia Separator Tank	YES
5	BTX Light Storage Tanks	YES
6	Tankcar/Truck Loading Area	YES
7	Wash Oil Tank Farm	YES
8	Gasoline Tank	YES
9	Emergency Diesel Tank	YES
10	Refractory Tank	NO
11	Slo Diesel Tank	YES
12	Locomotive Fuel Tanks	PROCESS
13	Container Repair Building	YES
14	Lid Seal Tank	NO
15	Portable Conveiners	YES
16	Process Area	PROCESS
17	Coal Yard	NO
18	Coke Yard	

S-1 = Source Number

Base Map taken from The Rust Engineering Company, Plot Plan Alabama By-Products Corp, Birmingham, Alabama, dated 6-9-1978

Site Map

ABC Coke SPCC/BMP Plan

Base Map Provided By ABC Coke

DRAWN BY: J. Simmons | Job #: 2003-0560A | SCALE: NTS

E. ROBERTS
Alley & Associates
INCORPORATED
Environmental Engineering & Consulting
210 North Atlanta Ave., Sheffield, Alabama 35660
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Sent To: Alexis Johnson - USEPA Region 4
Street, Apt. No., or PO Box No. 61 Forsyth Street SW
City, State, ZIP+4 ATLANTA, GA 30303

PS Form 3800, August 2006 — See Reverse for Instructions

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

SEP 20 2013

OVERNIGHT

Mr. W. M. Poling
Manager Engineering
ABC Coke
Post Office Box 10246
1000 Main Street
Birmingham, Alabama 35202

Re: Administrative Compliance Order on Consent CWA-04-2013-4762
ABC Coke Division – The Drummond Company
National Pollutant Discharge Elimination System Permit No.: AL0003417
Birmingham, Alabama

Dear Mr. Poling:

Enclosed please find the proposed Administrative Compliance Order on Consent (AOC), Docket No.: CWA-04-2013-4762, which is being issued to the ABC Coke Division of the Drummond Company, by the U.S. Environmental Protection Agency Region 4. This AOC addresses permit violations of National Pollutant Discharge Elimination System Permit No.: AL0003417, which occurred at the ABC Coke Division site in Birmingham, Alabama.

If you agree to the terms of this AOC, please sign and return it within five days of receipt of this letter to the following address:

U.S. Environmental Protection Agency, Region 4
Clean Water Enforcement Branch
Water Protection Division
Attn: Ms. Alenda Johnson
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

The AOC will become effective upon the date you receive a copy of the document signed by the Director of the Water Protection Division. If you have any comments or questions regarding this matter, please contact Ms. Kavita K. Batra, Associate Regional Counsel at (404) 562-9697 or Ms. Johnson, Enforcement Officer, at (404) 562-9761.

Sincerely,

Maurice L. Horsey, IV, Chief
Municipal & Industrial Enforcement Section
Clean Water Enforcement Branch

Enclosure

cc: Mr. Blake D. Andrews
Drummond Company, Inc.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4

IN THE MATTER OF:	) **ADMINISTRATIVE**
	) **ORDER ON CONSENT**
	)
ABC COKE DIVISION	)
THE DRUMMOND COMPANY	)
BIRMINGHAM, ALABAMA	) **DOCKET NO. CWA-04-2013-4762**
	)
PROCEEDING UNDER SECTION	)
309(a) OF THE CLEAN WATER ACT,	)
33 U.S.C. § 1319(a)	)
NPDES PERMIT NO. AL0003417	)

ADMINISTRATIVE ORDER ON CONSENT

I. STATUTORY AUTHORITY

1. Section 309(a) of the Clean Water Act ("CWA"), 33 U.S.C. § 1319(a), provides that, whenever the U.S. Environmental Protection Agency, Region 4 ("EPA") finds that any person is in violation of any condition or limitation which implements, *inter alia*, Sections 301 and 402 of the CWA, 33 U.S.C. §§ 1311 and 1342, the EPA may issue an order requiring such person to comply with such condition or limitation, and shall specify a time for compliance that the EPA determines to be reasonable.

2. The following Findings are made and this Administrative Order on Consent is issued pursuant to the authority vested in the Administrator of the EPA, by Section 309(a)(3) of the CWA, 33 U.S.C. § 1319(a)(3), as amended. This authority has been delegated to the Regional Administrator of the EPA, Region 4, and further delegated by the Regional Administrator to the Director of the Region 4 Water Protection Division.

II. EPA FINDINGS

3. To accomplish the objective of the CWA, defined in Section 101(a) of the CWA, 33 U.S.C. § 1251(a), to restore and maintain the chemical, physical, and biological integrity of the nation's waters, Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of pollutants by any person into waters of the United States except as in compliance with a National Pollutant Discharge Elimination System ("NPDES") permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342.

4. Section 402 of the CWA, 33 U.S.C. § 1342, establishes an NPDES Permit Program authorizing the EPA or authorized states to administer the NPDES Permit Program, including the issuance of NPDES permits allowing for the discharge of pollutants into navigable waters subject to

specific terms and conditions. The EPA has granted the State of Alabama through the Alabama Department of Environmental Management ("ADEM") approval to issue NPDES permits pursuant to Section 402(b) of the CWA.

5. ABC Coke Division is a part of Drummond Company, Inc. ("Respondent"), which is a corporation duly organized and existing under the laws of the State of Alabama and is a "person" within the meaning of Section 502(5) of the CWA, 33 U.S.C. § 1362(5).

6. At all times relevant to this action, the Respondent owned and/or operated a Biological Treatment Facility ("BTF"), located in Jefferson County at Railroad Street in Birmingham, Alabama.

7. Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of pollutants into the navigable waters of the United States, except in compliance with certain sections of the CWA.

8. The wastewater treatment operations, including the BTF and any other specified measures for control of pollutant and discharges from the ABC manufacturing plant, are regulated under NPDES Permit No. AL0003417 ("Permit") that went into effect on April 1, 2009, and the Permit will expire on March 31, 2014.

9. The Permit authorizes discharge of treated process wastewater and stormwater from coke making operations through outfall DSN 001 and discharge of stormwater runoff from the coal yard through outfall DSN 002. Monitoring requirements in the Permit applicable to DSN 002 require Respondent to monitor constituents that would indicate a discharge of any process related pollutants from the coal yard.

10. On August 13-16, 2012, the EPA conducted a Compliance Evaluation Inspection ("CEI") of the BTF and the industrial site to evaluate the Respondent's compliance with the Permit and the CWA. The CEI identified deficiencies related to preservation methods used to analyze samples, Best Management Practice deficiencies related to the stormwater controls and four non-stormwater discharges draining to the stormwater retention pond, which captures the stormwater runoff ultimately discharging through outfall DSN002. EPA found that one of those discharges was not specifically included in the Permit, and the others were not discharging in accordance with the terms of the Permit.

11. On May 10, 2013, the EPA sent a Letter of Concern ("LOC"), issued under the authority of Section 308(a) of the CWA, 33 U.S.C. § 1318(a), to the Respondent regarding alleged deficiencies identified during the inspection. The LOC also alleged two ammonia nitrogen effluent limits exceedances for the period covering January 1, 2010, through December 31, 2012. The LOC requested information on corrective actions planned or taken to address the deficiencies and effluent limit exceedances.

12. On June 17, 2013, the Respondent provided a response to the LOC. The response addressed all of the deficiencies with the exception that it stated that the Respondent believed the NPDES application allowed for these types of non-stormwater discharges and that three of these

discharges were reflected as "miscellaneous" discharges in Respondent's application for the Permit. The fourth discharge reflected a release from a Jefferson County pipeline that has been repaired, such that the release has ceased.

13. On July 16, 2013, the EPA concluded its review of the LOC response and the Respondent's permit application and determined that Part V. of form 2F, which is entitled *Application for Permit to Discharge Storm Water Discharges Associated with Industrial Activity*, contains a certification that all non-stormwater discharges should be identified in either form 2C for discharge of wastewater or 2E for discharge of noncontact process water, and no such non-stormwater discharges are so identified on either of those forms.

14. Based on the above, EPA has determined that the Respondent has violated Section 301(a) of the CWA, 33 U.S.C. § 1311(a), in that the Respondent has discharged wastewater to a location not authorized by an NPDES permit.

15. The EPA has determined that the Respondent has violated Section 301(a) of the CWA, 33 U.S.C. § 1311(a), and the Permit, by failing to comply with Part I.A. and Part II.E.2.a of the Permit.

16. To resolve this dispute, Respondent submitted an application for an amendment to the Permit that would clearly reflect that the continuing discharges to the stormwater control system are authorized.

17. On August 20, 2013, the Alabama Department of Environmental Management sent a Draft Permit modification to the Respondent for review that, if it becomes final, will authorize the three non-stormwater discharges through outfall DSN 002.

18. The Draft Permit will not become final until EPA and the public have commented on the Draft Permit, ADEM considers any comments, and makes a decision to issue a final permit, to deny the permit application or to modify the Draft Permit.

III. ORDER ON CONSENT

19. Based on the foregoing EPA FINDINGS and pursuant to the authority of Section 309(a) of the CWA, 33 U.S.C. § 1319(a), IT IS HEREBY ORDERED AND RESPONDENT HEREBY AGREES AND CONSENTS TO THE PROVISIONS OF THE PARAGRAPHS BELOW:

A. If ADEM does not issue the Draft Permit due to any deficiencies identified by ADEM, either with the permit application itself or otherwise, within thirty (30) days from when Respondent receives notification from ADEM that the application is deficient, Respondent shall submit to ADEM any and all additional information necessary to address the deficiencies identified by ADEM. If ADEM issues a final Permit that does

not authorize the discharges of any of the waste streams, as they are currently described in the Draft Permit, or if ADEM does not grant the permit modification, then within thirty (30) days from the date of ADEM's decision, Respondent shall immediately cease any discharges that are not authorized by Respondent's NPDES Permit, as issued by ADEM.

B. Within thirty (30) days of the effective date of this Order on Consent, the Respondent shall submit a copy of the revised BMP Plan to EPA and ADEM.

C. Within thirty (30) days of the effective date of this Order on Consent, the Respondent shall provide a description of the method utilized for routine cleaning and a schedule for which the cleaning of the stormwater catch basin will take place.

D. Within sixty (60) days of the effective date of this Order on Consent, the Respondent shall submit an engineering report assessing all stormwater runoff and process wastewater sources that contributed to the stormwater collection system (catch basin & retention pond). This assessment shall include an engineer calculation of the design storm, total hydraulic capacity as well as the inorganic/organic loading capacity of the stormwater treatment system. The engineer report shall be certified by Professional Engineer and submitted to EPA and ADEM.

E. Every month after the effective date of this Order on Consent, and continuing until all corrective actions have been completed, the Respondent shall submit to the EPA a written report containing information about the status and progress of the permit modification. The report shall also include a description of actions implemented to prevent future recurrence. The Respondent shall submit the report to the EPA within fifteen (15) days of the end of each month. The first monthly report shall be due following the end of the month during which this Order on Consent becomes effective.

20. All reports, notifications, documentation, and submittals required by this Order on Consent shall be signed by a duly authorized representative of ABC Coke Division as specified by 40 C.F.R. §§ 122.22(b)(2) and (d) and shall include the following statement:

> "I certify under the penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

21. All reports, notifications, documentation and submittals required by this Order on Consent shall be sent by certified mail or its equivalent to the following addresses:

Denisse D. Diaz, Chief
Clean Water Enforcement Branch
Water Protection Division
ATTN: Alenda Johnson
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

Glenda L. Dean, Chief
Water Division
Alabama Department of Environmental Management
P.O. Box 301463
Birmingham, Alabma 36130 -1463

IV. GENERAL PROVISIONS

22. The Respondent's compliance with this Order on Consent does not necessarily constitute compliance with the provisions of the CWA, 33 U.S.C. § 1251 et seq., or with Respondent's NPDES permit. The Respondent shall remain solely responsible for compliance with the terms of the CWA and this Order on Consent and its NPDES permit.

23. Failure to comply with the requirements herein shall constitute a violation of this Order on Consent and the CWA, and may subject Respondent to penalties as provided in Section 309(d) of the CWA, 33 U.S.C. § 1319(d).

24. This Order on Consent shall not relieve the Respondent of its obligation to comply with all applicable provisions of federal, state or local law, nor shall it be construed to be a ruling on, or determination of, any issue related to any other federal, state or local permit. Compliance with this Order on Consent shall not be a defense to any actions subsequently commenced pursuant to federal laws and regulations administered by EPA.

25. Issuance of this Order on Consent shall not be deemed an election by EPA to forego any remedies available to it under law, including without limitation, any administrative, civil, or criminal action to seek penalties, fines, or other appropriate relief (including injunctive relief) under the CWA or any other federal or state statute, regulation or permit. EPA reserves all rights and remedies, legal and equitable, available to enforce any violation cited in this Order on Consent and to enforce this Order on Consent.

26. This AOC is entered into voluntarily by Respondent to address and remedy the violations asserted herein by the EPA. This AOC has been negotiated by the parties in good faith.

27. This Order on Consent applies to and is binding upon Respondent and its officers, directors, employees, agents, successors and assigns.

28. Any change in the legal status of Respondent, including but not limited to any transfer of assets of real or personal property, shall not alter Respondent's responsibilities under this Order on Consent.

29. For purposes of this Order on Consent, Respondent admits to the jurisdictional allegations set forth herein but neither admits nor denies the EPA's Findings of Fact, set forth above. The EPA asserts that the facts stated herein are true and substantiated.

30. The Respondent waives any and all claims for relief and otherwise available rights or remedies to judicial or administrative review which Respondent may have with respect to any issue of fact or law set forth in this Order on Consent, including, but not limited to, any right of judicial review of this Order on Consent under the Administrative Procedure Act, 5 U.S.C. §§ 701-706.

31. Pursuant to Section 309(a)(4) of the CWA, 33 U.S.C. § 1319(a)(4), EPA has sent a copy of this Order on Consent to the State of Alabama.

32. The provisions of this AOC shall be deemed satisfied upon a determination by the EPA that Respondent has fully completed and implemented the actions required by this AOC.

V. EFFECTIVE DATE

33. This Order on Consent shall become effective upon Respondent's receipt of the fully executed Order on Consent.

FOR THE RESPONDENT:

_____ Date:_____
ABC Coke Division of Drummond Company, Inc.

Title_____

FOR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

_____ Date:_____
James D. Giattina
Director
Water Protection Division

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

SEP 27 2013

CERTIFIED MAIL 7012 1010 0001 8097 1990
RETURN RECEIPT REQUESTED

Mr. W. M. Poling
Manager Engineering
ABC Coke
Post Office Box 10246
1000 Main Street
Birmingham, Alabama 35202

Re: Administrative Compliance Order on Consent CWA-04-2013-4762
ABC Coke Division – The Drummond Company
National Pollutant Discharge Elimination System Permit No.: AL0003417

Dear Mr. Poling:

Pursuant to Section 309(a) of the Clean Water Act (CWA), 33 U.S.C. § 1319(a), as amended, the Director of the Water Protection Division, United States Environmental Protection Agency Region 4, has determined that the above named facility is in violation of Section 301 of the Clean Water Act (CWA), 33 U.S.C.§1311. As a result, the Director has issued the enclosed Administrative Order on Consent (AOC).

This AOC does not replace, modify or eliminate any other requirements of the CWA or National Pollutant Discharge Elimination System (NPDES) permit. Notwithstanding the issuance of this AOC, the EPA retains the right to bring further enforcement action under Sections 309(d) or 309(g) of the CWA, 33 U.S.C. §§ 1319(d) or 1319(g), for the violations cited therein or for any other violation of the CWA. Violations of the CWA, including requirements contained in a NPDES permit or an AOC issued under Section 309(a) of the CWA, remain subject to a civil penalty of up to $37,500 per day for each violation, pursuant to Sections 309(d) or 309(g) of the CWA, 33 U.S.C. §§ 1319(d) or 1319(g), as amended by the *Civil Monetary Penalty Inflation Adjustment Rule*, 73 Fed. Reg. 75340 (December 11, 2008). Such violations may also be subject to criminal penalties pursuant to Section 309(c) of the CWA.

If you or your client have any comments or questions regarding this matter, please contact Ms. Kavita K. Batra, Associate Regional Counsel at (404) 562-9697 or contact Ms. Alenda Johnson, Enforcement Officer, at (404) 562-9771.

Sincerely,

Denisse D. Diaz, Chief
Clean Water Enforcement Branch
Water Protection Division

Enclosure

cc: Ms. Glenda Dean
Alabama Department of Environmental Management, Montgomery

Mr. Blake D. Andrews
Drummond Company, Inc.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

SEP 27 2013

CERTIFIED MAIL 7012 1010 0001 8097 2003
RETURN RECEIPT REQUESTED

Ms. Glenda L. Dean, Chief
Water Division
Alabama Department of Environmental Management
P.O. Box 301463
Birmingham, Alabama 36130 -1463

Re: Administrative Compliance Order on Consent CWA-04-2013-4762
ABC Coke Division – The Drummond Company
National Pollutant Discharge Elimination System Permit No.: AL0003417

Dear Ms. Dean:

Pursuant to Section 309(a) of the Clean Water Act (CWA), 33 U.S.C. § 1319(a), I have determined that the above referenced facility is in violation of Section 301 of the CWA, 33 U.S.C. § 1311. As a result, I have issued an Administrative Order on Consent (AOC), a copy of which is enclosed for your reference. The AOC is presently being served.

Sincerely,

James D. Giattina
Director
Water Protection Division

Enclosure

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4

IN THE MATTER OF:	) **ADMINISTRATIVE**
	) **ORDER ON CONSENT**
	)
ABC COKE DIVISION	)
THE DRUMMOND COMPANY	)
BIRMINGHAM, ALABAMA	) **DOCKET NO. CWA-04-2013-4762**
	)
PROCEEDING UNDER SECTION	)
309(a) OF THE CLEAN WATER ACT,	)
33 U.S.C. § 1319(a)	)
NPDES PERMIT NO. AL0003417	)

ADMINISTRATIVE ORDER ON CONSENT

I. STATUTORY AUTHORITY

1. Section 309(a) of the Clean Water Act ("CWA"), 33 U.S.C. § 1319(a), provides that, whenever the U.S. Environmental Protection Agency, Region 4 ("EPA") finds that any person is in violation of any condition or limitation which implements, *inter alia*, Sections 301 and 402 of the CWA, 33 U.S.C. §§ 1311 and 1342, the EPA may issue an order requiring such person to comply with such condition or limitation, and shall specify a time for compliance that the EPA determines to be reasonable.

2. The following Findings are made and this Administrative Order on Consent is issued pursuant to the authority vested in the Administrator of the EPA, by Section 309(a)(3) of the CWA, 33 U.S.C. § 1319(a)(3), as amended. This authority has been delegated to the Regional Administrator of the EPA, Region 4, and further delegated by the Regional Administrator to the Director of the Region 4 Water Protection Division.

II. EPA FINDINGS

3. To accomplish the objective of the CWA, defined in Section 101(a) of the CWA, 33 U.S.C. § 1251(a), to restore and maintain the chemical, physical, and biological integrity of the nation's waters, Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of pollutants by any person into waters of the United States except as in compliance with a National Pollutant Discharge Elimination System ("NPDES") permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342.

4. Section 402 of the CWA, 33 U.S.C. § 1342, establishes an NPDES Permit Program authorizing the EPA or authorized states to administer the NPDES Permit Program, including the issuance of NPDES permits allowing for the discharge of pollutants into navigable waters subject to specific terms and conditions. The EPA has granted the State of Alabama through the Alabama

Department of Environmental Management ("ADEM") approval to issue NPDES permits pursuant to Section 402(b) of the CWA.

5. ABC Coke Division is a part of Drummond Company, Inc. ("Respondent"), which is a corporation duly organized and existing under the laws of the State of Alabama and is a "person" within the meaning of Section 502(5) of the CWA, 33 U.S.C. § 1362(5).

6. At all times relevant to this action, the Respondent owned and/or operated a Biological Treatment Facility ("BTF"), located in Jefferson County at Railroad Street in Birmingham, Alabama.

7. Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of pollutants into the navigable waters of the United States, except in compliance with certain sections of the CWA.

8. The wastewater treatment operations, including the BTF and any other specified measures for control of pollutant and discharges from the ABC manufacturing plant, are regulated under NPDES Permit No. AL0003417 ("Permit") that went into effect on April 1, 2009, and the Permit will expire on March 31, 2014.

9. The Permit authorizes discharge of treated process wastewater and stormwater from coke making operations through outfall DSN 001 and discharge of stormwater runoff from the coal yard through outfall DSN 002. Monitoring requirements in the Permit applicable to DSN 002 require Respondent to monitor constituents that would indicate a discharge of any process related pollutants from the coal yard.

10. On August 13-16, 2012, the EPA conducted a Compliance Evaluation Inspection ("CEI") of the BTF and the industrial site to evaluate the Respondent's compliance with the Permit and the CWA. The CEI identified deficiencies related to preservation methods used to analyze samples, Best Management Practice deficiencies related to the stormwater controls and four non-stormwater discharges draining to the stormwater retention pond, which captures the stormwater runoff ultimately discharging through outfall DSN002. EPA found that one of those discharges was not specifically included in the Permit, and the others were not discharging in accordance with the terms of the Permit.

11. On May 10, 2013, the EPA sent a Letter of Concern ("LOC"), issued under the authority of Section 308(a) of the CWA, 33 U.S.C. § 1318(a), to the Respondent regarding alleged deficiencies identified during the inspection. The LOC also alleged two ammonia nitrogen effluent limits exceedances for the period covering January 1, 2010, through December 31, 2012. The LOC requested information on corrective actions planned or taken to address the deficiencies and effluent limit exceedances.

12. On June 17, 2013, the Respondent provided a response to the LOC. The response addressed all of the deficiencies with the exception that it stated that the Respondent believed the NPDES application allowed for these types of non-stormwater discharges and that three of these discharges were reflected as "miscellaneous" discharges in Respondent's application for the Permit. The fourth discharge reflected a release from a Jefferson County pipeline that has been repaired, such that the release has ceased.

13. On July 16, 2013, the EPA concluded its review of the LOC response and the Respondent's permit application and determined that Part V. of form 2F, which is entitled *Application for Permit to Discharge Storm Water Discharges Associated with Industrial Activity*, contains a certification that all non-stormwater discharges should be identified in either form 2C for discharge of wastewater or 2E for discharge of noncontact process water, and no such non-stormwater discharges are so identified on either of those forms.

14. Based on the above, EPA has determined that the Respondent has violated Section 301(a) of the CWA, 33 U.S.C. § 1311(a), in that the Respondent has discharged wastewater to a location not authorized by an NPDES permit.

15. The EPA has determined that the Respondent has violated Section 301(a) of the CWA, 33 U.S.C. § 1311(a), and the Permit, by failing to comply with Part I.A. and Part II.E.2.a of the Permit.

16. To resolve this dispute, Respondent submitted an application for an amendment to the Permit that would clearly reflect that the continuing discharges to the stormwater control system are authorized.

17. On August 20, 2013, the Alabama Department of Environmental Management sent a Draft Permit modification to the Respondent for review that, if it becomes final, will authorize the three non-stormwater discharges through outfall DSN 002.

18. The Draft Permit will not become final until EPA and the public have commented on the Draft Permit, ADEM considers any comments, and makes a decision to issue a final permit, to deny the permit application or to modify the Draft Permit.

III. ORDER ON CONSENT

19. Based on the foregoing EPA FINDINGS and pursuant to the authority of Section 309(a) of the CWA, 33 U.S.C. § 1319(a), IT IS HEREBY ORDERED AND RESPONDENT HEREBY AGREES AND CONSENTS TO THE PROVISIONS OF THE PARAGRAPHS BELOW:

A. If ADEM does not issue the Draft Permit due to any deficiencies identified by ADEM, either with the permit application itself or otherwise, within thirty (30) days from when Respondent receives notification from ADEM that the application is deficient, Respondent shall submit to ADEM any and all additional information necessary to address the deficiencies identified by ADEM. If ADEM issues a final Permit that does not authorize the discharges of any of the waste streams, as they are currently described in the Draft Permit, or if ADEM does not grant the permit modification, then within thirty (30) days from the date of ADEM's decision, Respondent shall immediately cease any discharges that are not authorized by Respondent's NPDES Permit, as issued by ADEM.

B. Within thirty (30) days of the effective date of this Order on Consent, the Respondent shall submit a copy of the revised BMP Plan to EPA and ADEM.

C. Within thirty (30) days of the effective date of this Order on Consent, the Respondent shall provide a description of the method utilized for routine cleaning and a schedule for which the cleaning of the stormwater catch basin will take place.

D. Within sixty (60) days of the effective date of this Order on Consent, the Respondent shall submit an engineering report assessing all stormwater runoff and process wastewater sources that contributed to the stormwater collection system (catch basin & retention pond). This assessment shall include an engineer calculation of the design storm, total hydraulic capacity as well as the inorganic/organic loading capacity of the stormwater treatment system. The engineer report shall be certified by Professional Engineer and submitted to EPA and ADEM.

E. Every month after the effective date of this Order on Consent, and continuing until all corrective actions have been completed, the Respondent shall submit to the EPA a written report containing information about the status and progress of the permit modification. The report shall also include a description of actions implemented to prevent future recurrence. The Respondent shall submit the report to the EPA within fifteen (15) days of the end of each month. The first monthly report shall be due following the end of the month during which this Order on Consent becomes effective.

20. All reports, notifications, documentation, and submittals required by this Order on Consent shall be signed by a duly authorized representative of ABC Coke Division as specified by 40 C.F.R. §§ 122.22(b)(2) and (d) and shall include the following statement:

> "I certify under the penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

21. All reports, notifications, documentation and submittals required by this Order on Consent shall be sent by certified mail or its equivalent to the following addresses:

Denisse D. Diaz, Chief
Clean Water Enforcement Branch
Water Protection Division
ATTN: Alenda Johnson
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

Glenda L. Dean, Chief
Water Division
Alabama Department of Environmental Management
P.O. Box 301463
Birmingham, Alabma 36130 -1463

IV. GENERAL PROVISIONS

22. The Respondent's compliance with this Order on Consent does not necessarily constitute compliance with the provisions of the CWA, 33 U.S.C. § 1251 et seq., or with Respondent's NPDES permit. The Respondent shall remain solely responsible for compliance with the terms of the CWA and this Order on Consent and its NPDES permit.

23. Failure to comply with the requirements herein shall constitute a violation of this Order on Consent and the CWA, and may subject Respondent to penalties as provided in Section 309(d) of the CWA, 33 U.S.C. § 1319(d).

24. This Order on Consent shall not relieve the Respondent of its obligation to comply with all applicable provisions of federal, state or local law, nor shall it be construed to be a ruling on, or determination of, any issue related to any other federal, state or local permit. Compliance with this Order on Consent shall not be a defense to any actions subsequently commenced pursuant to federal laws and regulations administered by EPA.

25. Issuance of this Order on Consent shall not be deemed an election by EPA to forego any remedies available to it under law, including without limitation, any administrative, civil, or criminal action to seek penalties, fines, or other appropriate relief (including injunctive relief) under the CWA or any other federal or state statute, regulation or permit. EPA reserves all rights and remedies, legal and equitable, available to enforce any violation cited in this Order on Consent and to enforce this Order on Consent.

26. This AOC is entered into voluntarily by Respondent to address and remedy the violations asserted herein by the EPA. This AOC has been negotiated by the parties in good faith.

27. This Order on Consent applies to and is binding upon Respondent and its officers, directors, employees, agents, successors and assigns.

28. Any change in the legal status of Respondent, including but not limited to any transfer of assets of real or personal property, shall not alter Respondent's responsibilities under this Order on Consent.

29. For purposes of this Order on Consent, Respondent admits to the jurisdictional allegations set forth herein but neither admits nor denies the EPA's Findings of Fact, set forth above. The EPA asserts that the facts stated herein are true and substantiated.

30. The Respondent waives any and all claims for relief and otherwise available rights or remedies to judicial or administrative review which Respondent may have with respect to any issue of fact or law set forth in this Order on Consent, including, but not limited to, any right of judicial review of this Order on Consent under the Administrative Procedure Act, 5 U.S.C. §§ 701-706.

31. Pursuant to Section 309(a)(4) of the CWA, 33 U.S.C. § 1319(a)(4), EPA has sent a copy of this Order on Consent to the State of Alabama.

32. The provisions of this AOC shall be deemed satisfied upon a determination by the EPA that Respondent has fully completed and implemented the actions required by this AOC.

V. EFFECTIVE DATE

33. This Order on Consent shall become effective upon Respondent's receipt of the fully executed Order on Consent.

FOR THE RESPONDENT:

Date: 9.24.13

ABC Coke Division of Drummond Company, Inc.
Name: W. M. Poling
Print Title: Manager - Engr + Env.

FOR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

Date: 9/27/13

James D. Giattina
Director
Water Protection Division

POTENTIAL EJ AREAS AROUND ABC COKE, ALABAMA

Legend

- Site Location
- 1, 2, 3mi. Buffer Zones
- Major Streams
- Railroads
- Interstate
- US Hwy.
- State Hwy.
- Roads
- Counties
- Airports
- Indian Lands
- Water Bodies

% Low Income/Minority

- Low Income
- Minority
- Low Income/Minority
- Below state average

N

0 485 970 1,940 2,910 3,880

Meters

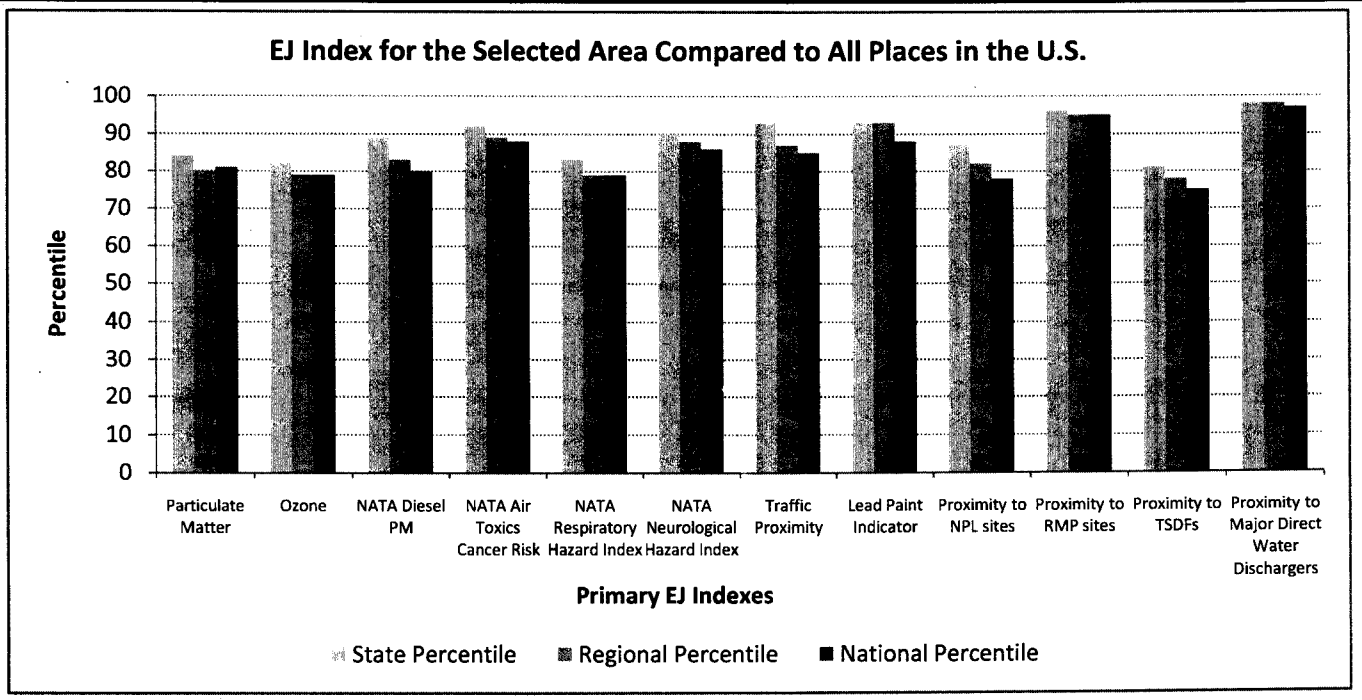
U.S. EPA REGION 4
OFFICE OF ENVIRONMENTAL ACCOUNTABILITY

United States Environmental Protection Agency

EJScreen Report for 1 Mile Ring Centered at 33.583 N, -86.780 W, Alabama
Approximate Population: 4503

08/04/14

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
Primary EJ Indexes			
Particulate Matter	84	80	81
Ozone	82	79	79
NATA Diesel PM	89	83	80
NATA Air Toxics Cancer Risk	92	89	88
NATA Respiratory Hazard Index	83	79	79
NATA Neurological Hazard Index	90	88	86
Traffic Proximity	93	87	85
Lead Paint Indicator	93	93	88
Proximity to NPL sites	87	82	78
Proximity to RMP sites	96	95	95
Proximity to TSDFs	81	78	75
Proximity to Major Direct Water Dischargers	98	98	97



This report shows environmental, demographic, and EJ indicator values. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators.

EPA United States Environmental Protection Agency

EJScreen Report for 1 Mile Ring Centered at 33.583 N, -86.780 W, Alabama
Approximate Population: 4503

08/04/14

Selected Variables	Raw Data	State Avg.	State %ile	EPA Region Avg.	EPA Region %ile	USA Avg.	USA %ile
Environmental Factors							
Particulate Matter (PM 2.5 in µg/m^3)	12.5	10.8	96	10.1	94	10.7	75
Ozone (ppb)	48.4	45.6	79	44.8	51	46	61
NATA Diesel PM (µg/m^3)	0.799	0.3580	88	0.53	76	0.8250	65
NATA Air Toxics Cancer Risk (risk per MM)	130	62	99	56	99	61	97
NATA Respiratory Hazard Index	3	2.4	79	2.7	65	3.1	61
NATA Neurological Hazard Index	0.11	0.0620	88	0.0520	97	0.0630	90
Traffic Proximity (daily traffic count/distance to road)	140	41	94	85	86	110	81
Lead Paint Indicator (% Pre-1960s Housing)	0.57	0.20	93	0.17	94	0.31	78
Proximity to NPL sites (facility count/km distance)	0.046	0.0420	75	0.07	63	0.0960	49
Proximity to RMP sites (facility count/km distance)	1.4	0.22	98	0.26	97	0.31	96
Proximity to TSDFs (facility count/km distance)	0.022	0.03	46	0.0350	54	0.0660	41
Proximity to Major Direct Dischargers (count/km)	1.4	0.21	99	0.19	99	0.25	98
Primary Demographic Index	68%	35%	88	36%	89	34%	89
Minority Population	73%	32%	86	35%	84	35%	82
Low Income Population	62%	38%	87	36%	88	32%	89
Linguistically Isolated Population	1%	1%	73	4%	54	5%	48
Population With Less Than High School Education	20%	19%	57	17%	66	15%	72
Population Under 5 years of age	7%	6%	63	7%	62	7%	61
Population over 64 years of age	10%	13%	34	14%	42	13%	45

For additional information, see: www.epa.gov/environmentaljustice

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

SEP 25 2015

CERTIFIED MAIL 7014 2870 0000 3318 3777
RETURN RECEIPT REQUESTED

Mr. W. M. Poling
Engineering Manager
ABC Coke
Post Office Box 10246
1000 Main Street
Birmingham, Alabama 35202

Re: Administrative Order Closure
Docket No.: CWA-04-2013-4762

Dear Mr. Poling:

The purpose of this letter is to inform you that the ABC Coke Corporation has satisfied the requirements of Administrative Order (AO) No.: CWA-04-2013-4762 issued on September 27, 2013. By copy of this letter, the AO has been terminated.

Termination of the AO shall not be deemed an election by the U.S. Environmental Protection Agency to forego any administrative, civil or criminal action or other appropriate relief under the Clean Water Act, nor will it relieve you of your obligations to comply with any other applicable federal, state or local law.

Should you have any questions concerning this matter, please contact Ms. Alenda Johnson of my staff at (404) 562-9761.

Sincerely,

James D. Giattina
Director
Water Protection Division

cc: Ms. Glenda Dean
Alabama Department of Environmental Management